

# **EPA Jacket 83451-22**

## **Vol.1**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL, SAFETY  
AND POLLUTION PREVENTION

Ross Beattie  
BWA Water Additives US LLC,  
1979 Lakeside Parkway, Suite 925,  
Tucker GA, 30084

SEP 23 2014

Subject: BELLACIDE 301  
EPA Reg. No.: 83451-22  
Notification Date: June 4, 2014  
EPA Receipt Date: June 6, 2014  
Submission #: 953261

Dear Ross Beattie,

This letter acknowledges receipt of your material submitted under the provision of the Federal Insecticide, Fungicide and Rodenticide Act. (FIFRA) section 3(c)9 and PR Notice 98-10.

**CONCLUSIONS:**

The product Science branch of the Antimicrobials Division finds the CSF for registration 83451-22, dated 6/4/14, to be acceptable.

Should you have any questions or comments concerning this letter, please contact Velma Noble, PM team 31 at (703) 308-6233 or Jamil Mixon at (703) 308-8032.

Sincerely,

A handwritten signature in black ink, appearing to read "Velma Noble", with a long horizontal flourish extending to the right.

Velma Noble,  
Product Manager, Team 31  
Regulatory Management Branch  
Antimicrobials Division (7510P)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



United States  
Environmental Protection  
Agency

**Office of Pesticide Programs**

Antimicrobials Division (AD)

August 25, 2014

EPA Reg#: 83451-22		DP Barcode: 420831	
		Submission #: 953261	
Product name: Bellacide 301		Registrant: BWI Water Additives US LLC	
Reviewer's name: Juan F. Negrón		AD/PSB/CTT- Product Chemistry Reviewer	
Agency due date: 09/04/14		PSB received date: 6/12/14	
CTT received date: 6/13/14		Science received date: 6/17/14	
Formulation type: EUP		Pesticide classification: Algacide, bactericide & fungicide	
Integrated system: <input type="checkbox"/>	Non-integrated system: <input checked="" type="checkbox"/>	Food use: <input type="checkbox"/>	Non food use: <input checked="" type="checkbox"/>
Action Code: 362		Date Completed: 8/20/2014	
PC Code(s)	CAS #(s)	Active Ingredient Names	% wt (label)
128824	81741-28-8	Tributyl tetradecyl phosphonium chloride	2.78
Molecule structure (optional):			
069183	31512-74-0	Poly[oxyethylene (dimethyliminio) ethylene (dimethyliminio) ethylene dichloride]	2.22
Molecule structure (optional):			
MRID:		Guideline:	
Approver: Karen P. Hicks		Approved date: 8/25/2014	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



United States  
Environmental Protection  
Agency


**Office of Pesticide Programs**


Antimicrobials Division (AD)

August 25, 2014

**MEMORANDUM**

**Subject:** Product Chemistry Review for EPA Reg # 83451-22.  
Product Name: Bellacide 301  
DP Barcode: 420831

**From:** Juan F. Negrón, Chemist   
Product Science Branch, CT Team  
Antimicrobials Division (7510P)

**Thru:** Karen P. Hicks, CT Team Leader  
Product Science Branch  
Antimicrobials Division (7510P) 

**To:** Eric Miederhoff / Karen Leavy  
PM Team 32

**APPLICANT:** BWI Water Additives US LLC  
**Action code:** 362  
**Due date:** 09/4/2014

**Product Formulation**  
**Active Ingredient from label:**

	% by wt.
Tributyl tetradecyl phosphonium chloride .....	2.78
Poly[oxyethylene (dimethyliminio)	
ethylene (dimethyliminio) ethylene dichloride] .....	2.22



## BACKGROUND:

The registrant, BWI Water Additives US LLC, is submitting an amendment for the end-use product, "Bellacide 301" non- integrated system for non-food use. The purpose of the amendment is to add an alternate formulation. One of the components in the formulation will be removed for operational and financial considerations. The registrant conducted a three month stability test and updated some physical properties such as color, density, and pH. The Product Chemistry Reviewer has reviewed the following documents:

- Confidential Statement of Formula (CSF), dated 06/04/2014, for alternate "#2" formulation.
- A letter, dated 6/04/2014.
- A label, dated 11/05/2012.

## FINDINGS:

1. The CSF, dated 06/04/2014, for alternate "#2" formulation is revised.
2. The CSF and the label have the same nominal concentration for the active ingredient (AI).
3. The registrant conducted a 90-day stability study and the average was found to be:
  - Tributyl tetradecyl phosphonium chloride = 2.83%
  - Poly[oxyethylene (dimethyliminio) ethylene dichloride] = 2.21%Both active ingredients meet the EPA Standard Certified Limits.
4. The registrant also conducted additional chemical physical test and the results are as follows:
  - Appearance – Clear, colourless liquid for both with and without the coupling agent that the registrant is proposing to remove.
  - Density – 8.5 lbs/gallon with the coupling agent & 1.0009 g/cm<sup>3</sup> (8.35 lbs/gallon) without the coupling agent.
  - pH – 5.2 (1% solution) with the coupling agent & 5.41 @ 20°C without the coupling agent

## CONCLUSIONS:

The CSF, dated 06/04/2014, for alternate "#2" formulation is acceptable. The proposed amendment is acceptable.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL, SAFETY  
AND POLLUTION PREVENTION

Ross Beattie  
BWA Water Additives US LLC,  
1979 Lakeside Parkway, Suite 925,  
Tucker GA, 30084

SEP 23 2014

Subject: BELLACIDE 301  
EPA Reg. No.: 83451-22  
Notification Date: June 4, 2014  
EPA Receipt Date: June 6, 2014  
Submission #: 953261

Dear Ross Beattie,

This letter acknowledges receipt of your material submitted under the provision of the Federal Insecticide, Fungicide and Rodenticide Act. (FIFRA) section 3(c)9 and PR Notice 98-10.

**CONCLUSIONS:**

The product Science branch of the Antimicrobials Division finds the CSF for registration 83451-22, dated 6/4/14, to be acceptable.

Should you have any questions or comments concerning this letter, please contact Velma Noble, PM team 31 at (703) 308-6233 or Jamil Mixon at (703) 308-8032.

Sincerely,

A handwritten signature in black ink, appearing to read "Velma Noble", written over a horizontal line.

Velma Noble,  
Product Manager, Team 31  
Regulatory Management Branch  
Antimicrobials Division (7510P)

*Completed*  
*[Signature]*  
*[Signature]*

<b>A</b>	Completed by Product Manager						
PRODUCT REVIEWER: <i>Cletis John C</i>						RMBI <u>TEAM 31</u>	
Type of Action: <i>PSF Amendment</i>						EPA File Symbol/Reg No. <i>83451-22</i>	
Decision No.		Submission No.			Fee for Service Action Code:		
FQPA Action Code: <i>362</i>		Non-FQPA Action Code:			PRIA FEE AMOUNT:		
APPLICATION DATE		<i>6</i>		<i>4</i>		2014	
EPA PIN DATE		<i>6</i>		<i>6</i>		2014	
DATE PM RECEIVED FROM FRONT END						2014	
DATE SENT TO SCIENCE							
DATE RECEIVED FROM SCIENCE							
DATE DUE TO PM							
Type of Data:	PSB Product Chemistry	PSB Acute Toxicology	PSB Efficacy	RASSB Environmental Fate	RASSB Ecological Effects	RASSB Chronic Toxicology	RASSB Exposure/Residue
<b>B</b>	For Arctic Slope Contract Only						
Contract No.: 0052			ARCTIC SLOPE/MANAGER				
Final Task: Signature _____ (Total hrs)							
<b>C</b>	Reviewer Comments:						
DATE FEE PAID:				RESPONSE CODE:		RESPONSE DATE:	

JUL 1 - 2014



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL, SAFETY  
AND POLLUTION PREVENTION

Ross Beattie,  
BWA Water Additives,  
1979 Lakeside Parkway,  
Suite 925,  
Tucker, GA 30084

JUN 16 2014

Subject:	Additional Product Brand Name
Product Name:	Bellacide 301
EPA Registration No.:	83451-22
Notification Date:	5/20/14
EPA Receipt Date:	5/22/14
Submission #:	952674

Ross Beattie,

This letter acknowledges receipt of your notification submitted under the provision of FIFRA section 3(c)9 and PR Notice 98-10.

**Proposed Notification Alternate Brand Name:**

- **Bellacide 300**

**General Comments**

Based on a review of the submitted materials, your notification for the alternate brand names listed above, is acceptable. If you have any additional questions please contact me at [Mixon.Cletis@epa.gov](mailto:Mixon.Cletis@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Jamil Mixon".

Jamil Mixon,  
Product Management, Team 31  
Regulatory Management Branch  
Antimicrobials Division (7510P)

**RISK ASSIGNMENT FORM**  
Antimicrobial Division/Regulatory Management Branch I

<b>A</b>	Completed by Product Manager						
PRODUCT REVIEWER: <i>Cletis</i>					RMBI <u>TEAM 31</u>		
Type of Action: <i>Not. for action</i>					EPA File Symbol/Reg No. <i>83451-22</i>		
Decision No.		Submission No.		Fee for Service Action Code:			
FQPA Action Code: <i>332</i>		Non-FQPA Action Code:		PRIA FEE AMOUNT:			
		MONTH		DAY		YEAR	
APPLICATION DATE		<i>5</i>		<i>20</i>		<i>2014</i>	
EPA PIN DATE		<i>5</i>		<i>22</i>		<i>2014</i>	
DATE PM RECEIVED FROM FRONT END		<i>6</i>		<i>19</i>		<i>2014</i>	
DATE SENT TO SCIENCE							
DATE RECEIVED FROM SCIENCE							
DATE DUE TO PM							
Type of Data:	PSB Product Chemistry	PSB Acute Toxicology	PSB Efficacy	RASSB Environmental Fate	RASSB Ecological Effects	RASSB Chronic Toxicology	RASSB Exposure/Residue
ATTACHMENTS: LABELING 6-CCFIS 6-DATA 6-OTHERS							
<b>B</b>	For Arctic Slope Contract Only						
	Contract No.: 0052		ARCTIC SLOPE/MANAGER				
	Final Task: Signature _____ (Total hrs)						
<b>C</b>	Reviewer Comments:						
DATE FEE PAID:				RESPONSE CODE:		RESPONSE DATE:	

Receipt for Section 3

S: 952674

Milestone

Regulatory Type: Product Registration - Section 3

Resubmission: ☐ Yes ☒ No

Application Type: Notification

Fee For Service: ☐ Yes ☒ No

Company: 83451 BWA WATER ADDITIVES US LLC



Print Letter

Enter More Information

Tracking

Risk Manager: Antimicrobials Division, Risk Management Team 31

Product #: 83451-22

Product Name: BELLACIDE 301

Override#:

Me Too

Me Too Product

Section3:

Name:

Application Date: 20-May-2014



OPP Rec'd Date: 22-May-2014



Front End Date: 22-May-2014



Risk Manager Send Date: 22-May-2014



FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

NOTIFICATION to add an alternate brand name.

Receipt Content

Des

Paper Label

View/Edit

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

New Ingredient

Request Date

New Ingredient

Received Date



**BWA™**  
Water Additives

BWA Water Additives  
1979 Lakeside Parkway  
Suite 925  
Tucker, GA 30084

Tel 678 802 3050  
Fax 678 802 3024

May 20, 2014

Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504P)  
U. S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202

**Re: Bellacide 301**  
**EPA Registration No.: 83451-22**

Sir/Madam:

Please process the enclosed notification for the above referenced product. The purpose of this notification is to: (1) add an Alternative Brand Name to the registration. An explanation is provided for this request below.

1. Alternate Brand Name:

The current allowable Brand Name for the above product is "Bellacide 301". BWA Water Additives US LLC would like to include the Alternative Brand Name **Bellacide 300**. This product is only for industrial and institutional use, not for residential use.

Enclosed please find:

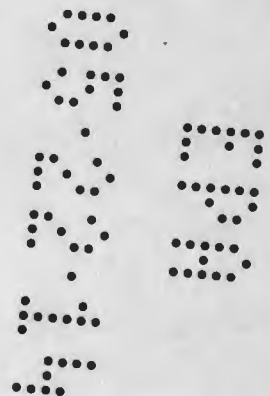
1. Application for Pesticide (EPA Form 8570-1); and
2. Notification Certification Statement

Thank you for your attention to this matter.

Sincerely,

Ross Beattie  
Product Registration Manager  
BWA Water Additives  
p)678-802-3032  
[ross.beattie@wateradditives.com](mailto:ross.beattie@wateradditives.com)

Enclosures







United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☐ Amendment  
☒ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number 83451-22	2. EPA Product Manager Velma Noble	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Bellacide 301	PM# 31	
5. Name and Address of Applicant (Include ZIP Code) BWA Water Additives US LLC 1979 Lakeside Parkway, Suite 925 Tucker GA, 30084 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____

## Section - II

<input type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Fee Determination: Fee Category - Not Applicable (Notification) ross.beattie@wateradditives.com

This submission is to add an alternate brand name.

Add Alternate Brand Name: Bellacide 301

See attached page for certification. Please see cover letter for additional details.

## Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> on label	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Ross Beattie	Title Product Registration Manager	Telephone No. (Include Area Code) 678-802-3032	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 	3. Title Product Registration Manager		
4. Typed Name Ross Beattie	5. Date May 20, 2014		



**EPA Registration Number: 83451-22**

**Product: Bellacide 301**

**Application for Pesticide dated: May 20, 2014**

**Section - II**

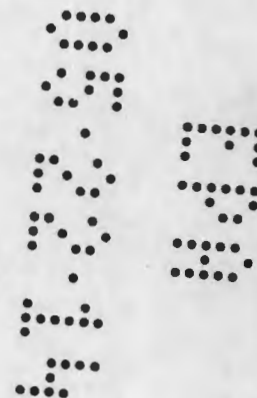
**Explanation (Continued)**

Below is an alternate brand name to be used with this registration:

**Bellacide 300**

"Notification of alternate brand names per PR Notice 98-10, Section II (Labeling Notifications), Part A (Brand Names)."

"This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA."



# DA1. ACKAGE BEAN SHEET

Date: 12-Jun-2014

Page 1 of 1

Decision #: 492034

DP #: (420831)

NON PRIA

Parent DP #:

Submission #: 953261

E-Sub #:

## \*\*\* Registration Information \*\*\*

Registration: 83451-22 - BELLACIDE 301

Company: 83451 - BWA WATER ADDITIVES US LLC

Risk Manager: RM 31 - Velma Noble - (703) 308-6233 Room# PY1 S-8855

Risk Manager Reviewer: JohnC Cowden JCOWDE02

Sent Date: \_\_\_\_\_

PRIA Due Date: 04-Sep-2014

Edited Due Date: \_\_\_\_\_

Type of Registration: Product Registration - Section 3

Action Desc: (362) FORMULA CHANGE;TECHNICAL;

Ingredients: 128824, Tri-n-butyl tetradecyl phosphonium chloride(2.78%)

069183, Poly(oxy-1,2-ethanediyl(dimethylimino)-1,2-ethanediyl(dimethylimino)-1,2-ethanediyl dichloride)(2.22%)

## \*\*\* Data Package Information \*\*\*

Expedite: ☐ Yes ☒ No

Date Sent: 12-Jun-2014

Due Back: \_\_\_\_\_

DP Ingredient: 069183, Poly(oxy-1,2-ethanediyl(dimethylimino)-1,2-ethanediyl(dimethylimino)-1,2-ethanediyl di

128824, Tri-n-butyl tetradecyl phosphonium chloride

DP Title: Product Chemistry for Review

CSF Included: ☐ Yes ☒ No

Label Included: ☐ Yes ☒ No

Parent DP #: \_\_\_\_\_

Assigned To

Date In

Date Out

Organization: AD / PSB

Last Possible Science Due Date: 21-Jul-2014

Team Name: CTT

Science Due Date: \_\_\_\_\_

Reviewer Name: \_\_\_\_\_

Sub Data Package Due Date: \_\_\_\_\_

Contractor Name: \_\_\_\_\_

## \*\*\* Studies Sent for Review \*\*\*

No Studies

## \*\*\* Additional Data Package for this Decision \*\*\*

No Additional Data Packages

## \*\*\* Data Package Instructions \*\*\*

Registrant has submitted a CSF to be reviewed. Cover letter enclosed.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Ross Beattie  
Product Registration Manager  
BWA Water Additives  
1979 Lakeside Parkway  
Suite 925  
Tucker, GA 30084

JUN 10 2014

SUBJECT: Bellacide 301  
EPA Registration Number: 83451-22  
Application Dated: March 28, 2014  
Receipt Date: March 31, 2014

Dear Mr. Beattie:

This letter acknowledges receipt of the amendment identified above submitted under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended.

- CSF revision: to add an alternate formulation.

Based on a review of the submitted Confidential Statement of Formula (CSF), dated 03/28/14 this amendment is acceptable. This formulation will be made part of the record for this file. Should you have any questions concerning this letter, please contact John Cowden at (703) 347-0259.

Sincerely,

A handwritten signature in black ink, appearing to read "V. Noble", is written over the typed name.

Velma Noble  
Product Manager (31)  
Regulatory Management Branch I

7510P:J.Cowden:3/28/2014: 83451-22 acceptable CSF

Create/Edit Collections		Utilities	Query Tool	Portal	Help	Exit
S: 953261		Milestone E:				
Regulatory Type:	Product Registration - Section 3			Resubmission:	<input type="radio"/> Yes <input checked="" type="radio"/> No	
Application Type:	Amendment			Fee For Service:	<input type="radio"/> Yes <input checked="" type="radio"/> No	
Company: 83451 BWA WATER ADDITIVES US LLC				Billable:	<input type="radio"/> Yes <input checked="" type="radio"/> No	
				V		
Risk Manager:	Antimicrobials Division, Risk Management Team 31					
Product #:	83451-22	Product Name:	BELLACIDE 301			
Override#:						
Me Too	Me Too Product					
Section3:	Name:					
Application Date:	04-Jun-2014	OPP Rec'd Date:	06-Jun-2014			
Front End Date:	06-Jun-2014	Risk Manager Send Date:	09-Jun-2014			
FFS Due Date:		Negotiated Due Date:				
OPP Target Date:						
Fast Track:	<input type="checkbox"/>	New Ingredient:	<input type="checkbox"/>			
Receipt Description:				View/Edit		
CSF amendment.				New Ingredient Request Date:		
				New Ingredient Received Date:		
Form A: <input type="checkbox"/>				Signature Date:		
Signature Date:				Form B: <input type="checkbox"/>		
				Signature Date:		
<div>Print Letter</div> <div>Enter More Information</div> <div>Tracking</div>						



**BWA™**  
Water Additives

BWA Water Additives  
1979 Lakeside Parkway  
Suite 925  
Tucker, GA 30084

Tel 678 802 3050  
Fax 878 802 3024

\_\_\_\_\_ details these findings; you'll see that there were no significant changes in the product.

If you remember, I had contacted both you and Juan Negrón in May 2014 to confirm that this would be an acceptable approach to adjusting the formulation and you could not see any objections, but thought it best to consult with Karen Hicks. Ms. Hicks also agreed that this was an acceptable approach.

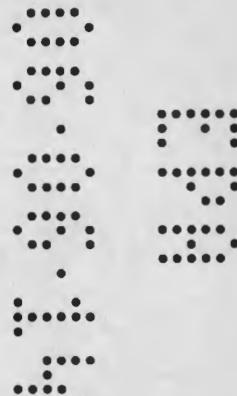
Enclosed please find:

1. Application for Pesticide (EPA Form 8570-1);
2. Two (2) copies of the CSF, Alternate Formulation #2;
3. 'Modified Bellacide 301 (DP7022) Three Month Stability Test';
4. 'Physical and chemical differences of Bellacide 301 when comparing the product with and without \_\_\_\_\_'

Thank you for your attention to this matter.

Sincerely,

Ross Beattie  
Product Registration Manager  
BWA Water Additives  
p)678-802-3032  
f)678-802-3024









United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☒ Amendment  
☐ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number 83451-22	2. EPA Product Manager Velma Noble	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Bellacide 301	PM# 31	
5. Name and Address of Applicant (Include ZIP Code) BWA Water Additives US LLC 1979 Lakeside Parkway, Suite 925 Tucker GA, 30084 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____

## Section - II

- ☒ Amendment - Explain below. ☐ Final printed labels in response to Agency letter dated \_\_\_\_\_
- ☐ Resubmission in response to Agency letter dated \_\_\_\_\_ ☐ "Me Too" Application.
- ☐ Notification - Explain below. ☐ Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Fee Determination: Fee Category - Not Applicable (Fast Track Amendment) ross.beattie@wateradditives.com

Currently the Bellacide 301 formulation includes an inert component, \_\_\_\_\_; it's function is as a formulation stabilizing agent. Testing has shown that Bellacide 301 does not require a coupling agent. BWA will replace the removed inert component \_\_\_\_\_, maintaining the concentrations of the Active Ingredients. BWA would like to register this with EPA as Alternate CSF #2. Please see cover letter for additional details.

## Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container		
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> on label	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other			

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Ross Beattie	Title Product Registration Manager	Telephone No. (Include Area Code) 678-802-3032
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		Date Application Received (Stamped)
2. Signature 	3. Title Product Registration Manager	
4. Typed Name Ross Beattie	5. Date June 4, 2014	





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

June 9, 2014

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

ROSS BEATTIE  
BWA WATER ADDITIVES US LLC  
1979 LAKESIDE PARKWAY, SUITE 925  
TUCKER, GA 30084-

PRODUCT NAME: BELLACIDE 301  
COMPANY NAME: BWA WATER ADDITIVES US LLC  
OPP IDENTIFICATION NUMBER:  
EPA FILE SYMBOL: 83451-22  
EPA RECEIPT DATE: 06/06/14

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Antimicrobials Division, Risk Management Team 31, at (703) 308-6233.

Sincerely,

Front End Processing Staff  
Information Services Branch  
Information Technology & Resources Management Division

**Fee for Service**

{953261Ê~

This package includes the following

- ☐ New Registration
- ☒ Amendment

- ☐ Studies?      ☐ Fee Waiver?
- ☐ volpay    % Reduction: \_\_\_\_

for Division

- ☒ AD
- ☐ BPPD
- ☐ RD

Risk Mgr. 31

Receipt No.

S-

953261

EPA File Symbol/Reg. No.

83451-22

Pin-Punch Date:

6/6/2014

☒ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: \$ \_\_\_\_\_

Parent/Child Decisions:

☐ Inert Cleared for Intended Use



Uncleared Inert in Product

Reviewer: T. Lantz Team 2

Date: 6/6/14

Remarks:



**BWA™**  
Water Additives

BWA Water Additives  
1979 Lakeside Parkway  
Suite 925  
Tucker, GA 30084  
Tel 678 802 3050  
Fax 678 802 3024

June 4, 2014

Document Processing Desk (AMEND)  
Office of Pesticide Programs (7504P)  
U. S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202

**Re: Bellacide 301 - EPA Registration No.: 83451-22**  
**Removal of Unneeded Inert Component**  
**Alternate Confidential Statement of Formula #2**

Ms. Noble:

Please process the enclosed amendment for the above referenced product.

The current Bellacide 301 (EPA Reg. No. 83451-22) formulation contains the inert ingredient [REDACTED]. This inert component is required as a formulation stabilizing component for 'Bellacide 303' (EPA Reg. No. 83451-20), a concentrated version of the 5% Bellacide 301 product.

Recent studies have shown that Bellacide 301 remains stable in solution, without the stabilizer.

BWA would like submit an Alternate Confidential Statement of Formula #2 in order to remove this component from the formulation of Bellacide 301 for Operational and Financial considerations. One less component allows for easier manufacture and also allows for a reduction of manufacturing costs. [REDACTED], there by maintaining the current Active Ingredient concentrations.

In support of this request, BWA conducted a 90-day stability study showing that the product stays in solution without the presence of [REDACTED]; please refer to 'Modified Bellacide 301 (DP7022) Three Month Stability Test', a summary of the study, including photographs.

BWA also conducted a number of Physical and Chemical measurements to ensure that Bellacide 301 was not adversely affected by the remove of [REDACTED]. Table 1. Physical and chemical attributes of Bellacide 301 when comparing the product with and without [REDACTED]

\* Inert ingredient information may be entitled to confidential treatment\*

DP#: (420832)

\*\*\* Product Data Package Ingredients \*\*\*

Decision#: (492033)

PC Code	CAS	Ingredient Name
069149	7173-51-5	1-Decanaminium, N-decyl-N,N-dimethyl-, chloride
069105	68424-85-1	Alkyl* dimethyl benzyl ammonium chloride *(50%C14, 40%C12, 10%C16)
069166	5538-94-3	1-Octanaminium, N,N-dimethyl-N-octyl-, chloride
069165	32426-11-2	1-Decanaminium, N,N-dimethyl-N-octyl-, chloride
069165	32426-11-2	1-Decanaminium, N,N-dimethyl-N-octyl-, chloride(.37%)
069105	68424-85-1	Alkyl* dimethyl benzyl ammonium chloride *(50%C14, 40%C12, 10%C16)(.49%)
069166	5538-94-3	1-Octanaminium, N,N-dimethyl-N-octyl-, chloride(.14%)
069149	7173-51-5	1-Decanaminium, N-decyl-N,N-dimethyl-, chloride(.22%)

DP#: (420832)

\*\*\* Product Data Package Ingredients \*\*\*

Decision#: (492033)

PC Code	CAS	Ingredient Name
069149	7173-51-5	1-Decanaminium, N-decyl-N,N-dimethyl-, chloride
069105	68424-85-1	Alkyl* dimethyl benzyl ammonium chloride *(50%C14, 40%C12, 10%C16)
069166	5538-94-3	1-Octanaminium, N,N-dimethyl-N-octyl-, chloride
069165	32426-11-2	1-Decanaminium, N,N-dimethyl-N-octyl-, chloride
069165	32426-11-2	1-Decanaminium, N,N-dimethyl-N-octyl-, chloride(.37%)
069105	68424-85-1	Alkyl* dimethyl benzyl ammonium chloride *(50%C14, 40%C12, 10%C16)(.49%)
069166	5538-94-3	1-Octanaminium, N,N-dimethyl-N-octyl-, chloride(.14%)
069149	7173-51-5	1-Decanaminium, N-decyl-N,N-dimethyl-, chloride(.22%)



United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☒ Amendment  
☐ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number 83451-22	2. EPA Product Manager Velma Noble	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Bellacide 301	PM# 31	
5. Name and Address of Applicant (Include ZIP Code) BWA Water Additives US LLC 1979 Lakeside Parkway, Suite 925 Tucker GA, 30084 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____

## Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Fee Determination: Fee Category - Not Applicable (Fast Track Amendment) ross.beattie@wateradditives.com

The purpose of this submission is to add an alternate formulation for Bellacide 301. Currently Bellacide 301 is manufactured from a number of raw materials; BWA would prefer to dilute a concentrated form of the product (Bellacide 303, EPA Reg. No. 83451-20) to manufacture Bellacide 301. BWA would also like to list additional manufacturing sites to the Confidential Statement of Formula. Please see cover letter for additional details.

## Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> on label	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Ross Beattie		Title Product Registration Manager		Telephone No. (Include Area Code) 678-802-3032	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped) 
2. Signature 		3. Title Product Registration Specialist			
4. Typed Name Ross Beattie		5. Date March 28, 2014			



**BWA™**  
Water Additives

BWA Water Additives  
1979 Lakeside Parkway  
Suite 925  
Tucker, GA 30084

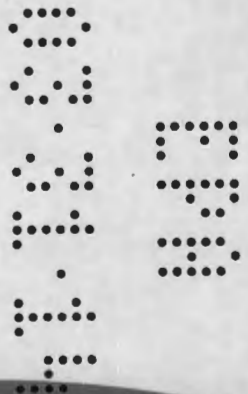
Tel 678 802 3050  
Fax 678 802 3024

Enclosed please find:

1. Application for Pesticide (EPA Form 8570-1);
  2. Two (2) copies of the CSF, Alternate Formulation #1;
- Thank you for your attention to this matter.

Sincerely,

Ross Beattie  
Product Registration Manager  
BWA Water Additives  
p)678-802-3032  
f)678-802-3024





**BWA™**  
Water Additives

BWA Water Additives  
1979 Lakeside Parkway  
Suite 925  
Tucker, GA 30084

Tel 678 802 3050  
Fax 678 802 3024

March 28, 2014

Document Processing Desk (AMEND)  
Office of Pesticide Programs (7504P)  
U. S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202

**Re: Bellacide 301 - EPA Registration No.: 83451-22**  
**Alternate Source of Raw Materials (Dilution from concentrated version of the product)**  
**Additional Manufacture Sites**

Sir/Madam:

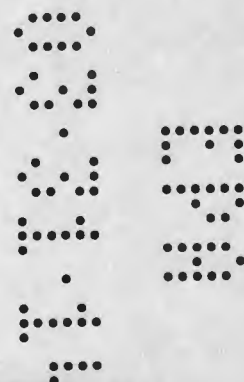
Please process the enclosed amendment for the above referenced product.

Bellacide 301 (EPA Reg. No. 83451-22) is currently manufactured from a number of raw materials. These raw materials are also used to manufacture a concentrated version of Bellacide 301 (known as Bellacide 303, EPA Reg. No. 83451-20).

The relative percentages of each of the raw material components in Bellacide 301 and 303 are the same.

Rather than manufacturing Bellacide 301 from the individual raw materials, BWA Water Additives would like to have the option to dilute Bellacide 303 by a factor of 5.4, resulting in a product that is 5.0% Active Ingredient (as is described in the current Bellacide 301 Confidential Statement of Formula).

In addition to this action, BWA would like to add four (4) additional manufacturing sites to the CSF, allowing for greater flexibility in where Bellacide 301 can be manufactured.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



United States  
Environmental Protection  
Agency

**Office of Pesticide Programs**

Ross Beattie,  
BWA Water Additives US LLC,  
1979 Lakeside Parkway Suite 925,  
Tucker, GA 30084

JAN 14 2013

SUBJECT: Bellacide 301  
EPA Registration #: 83451-22  
Application Date: 10/12/12  
Receipt Date: 10/16/12  
Submission # 925529

Dear Ross Beattie:

The following amendment, submitted under the provisions of section 3(c)9 the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended is acceptable.

The submission dated 10/12/12, for registration 83451-22, is found to be acceptable. Please see attached review.

**General Comments**

Should you have any questions concerning this letter, please contact Velma Noble at (703) 308-6233 or Jamil Mixon at (703) 308-8032.

Sincerely,

A handwritten signature in black ink, appearing to read 'V. Noble'.

Velma Noble  
Product Manager (31)  
Regulatory Management Branch I  
Antimicrobials Division (7510P)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



United States  
Environmental Protection  
Agency

**Office of Pesticide Programs**

Ross Beattie,  
BWA Water Additives US LLC,  
1979 Lakeside Parkway Suite 925,  
Tucker, GA 30084

JAN 14 2013

SUBJECT: Bellacide 301  
EPA Registration #: 83451-22  
Application Date: 10/12/12  
Receipt Date: 10/16/12  
Submission # 925529

Dear Ross Beattie:

The following amendment, submitted under the provisions of section 3(c)9 the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended is acceptable.

The submission dated 10/12/12, for registration 83451-22, is found to be acceptable. Please see attached review.

**General Comments**

Should you have any questions concerning this letter, please contact Velma Noble at (703) 308-6233 or Jamil Mixon at (703) 308-8032.

Sincerely,

A handwritten signature in black ink, appearing to read "Velma Noble".

Velma Noble  
Product Manager (31)  
Regulatory Management Branch I  
Antimicrobials Division (7510P)

# Material Sent for Data Extraction

Reg # 83451-22

Description: \_\_\_\_\_

☐ Material(s) Sent to Data Extraction Contractors:

☐ New Stamped Label Dated \_\_\_\_\_

☐ Notification Dated \_\_\_\_\_

☐ New CSF(s) Dated \_\_\_\_\_

☐ Other: \_\_\_\_\_

☐ Decision #: \_\_\_\_\_

☐ Other Action/Comments: CSF

Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer: PIN Team 3/

Phone: 2033088032 Division: AD

Date: 1/10/13

Created February 3, 2011

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



United States  
Environmental Protection  
Agency

**Office of Pesticide Programs**

Antimicrobials Division (AD)  
January 8, 2013

EPA Reg#: 83451-22		DP Barcode: 406822	
		Submission #: 925529	
Product name: Bellacide 301		Registrant: BWA Water Additives US LLC	
Reviewer's name: Juan F. Negrón		AD/PSB/CTT- Product Chemistry Review	
Agency due date: 01/14/2013		PSB received date: 11/15/2012	
CTT received date: 11/15/2012		Science due date: 11/16/12	
Formulation type: EUP		Sub data package due date: 11/16/12	
Integrated system: <input type="checkbox"/>	Non integrated system: <input checked="" type="checkbox"/>	Food use: <input type="checkbox"/>	Non food use: <input checked="" type="checkbox"/>
Action Code: 362		Date Completed: 01/08/13	
PC Code	CAS #(s)	Active Ingredient Names	% wt (label)
128824	81741-28-8	Tributyl tetradecyl phosphonium chloride (TTPC)	2.78
Molecule structure (optional):			
069183	31512-74-0	(Poly[oxyethylene(dimethyliminio)ethylene(dimethyliminio)ethylene dichloride] (WSCP)	2.22
Molecule structure (optional):			
Test Lab:			
MRID(s): 48970900, 48970901			
Approver: Karen P. Hicks		Approved date: 01/08/13	
Guideline: 830.6317, 830.6320			
Comments:			

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



United States  
Environmental Protection  
Agency

Office of Pesticide Programs

**Antimicrobials Division (AD)**

January 8, 2013

**MEMORANDUM**

**Subject:** Product Chemistry Review for EPA Reg # 83451-22.  
Product name: Bellacide 301  
DP # 406822

**From:** Juan F. Negrón, Chemist *JFN*  
Product Science Branch, CT Team  
Antimicrobials Division (7510P)

**Thru:** Karen P. Hicks, CT Team Leader  
Product Science Branch  
Antimicrobials Division (7510P) *KPH*

**To:** Velma Noble / Drusilla Copeland  
PM Team 31  
Antimicrobials Division (7510P)

**Applicant** BWA Water Additives US LLC  
**Action Code** 362  
**Due date:** 01/14/13

**Product Formulation from label**  
**Active Ingredient**

**% by wt.**

Tributyl tetradecyl phosphonium chloride	.....	2.78
Poly[oxyethylene(dimethyliminio)ethylene (dimethyliminio) ethylene dichloride]	.....	2.22

## BACKGROUND:

The registrant, BWA Water Additives US LLC, has submitted the storage stability and corrosion characteristics studies as part of the requirement to register a product. The product, Bellacide 301, is a new end-use product to be used as an algaecide, bactericide, and fungicide in various industrial applications. The product is for industrial use only, using closed metered delivery systems. The product is produced by a non-integrated system. The product is under the DFE pesticide pilot program in which the Agency requested to have a unique registration rather than an alternate of an existing registration. The method to assay the active ingredient (TTPC) was conducted using an HPLC and the parameters are in section 5.1.3.1, and the active ingredient (WSCP) used a titration method and the parameters are in section 5.1.3.2, 5.1.4.2 & 5.1.4.3 of the MRID #48970901. The product chemistry reviewer has received the following documents:

- A letter undated, pin punch date on 10/16/12.
- A study titled "Determination of Storage Stability and Corrosion Characteristic" MRID # 48970901.
- A label, dated 11/05/12.

## FINDINGS:

1. The OPPTS 830.6317 (Storage Stability) was conducted for 12 months and the result is as follows:

Sample	TTPC Mean (% w/w)	WSCP Mean (% w/w)
Initial (A, B, & C)	2.71	2.24
3 Months @ 25± 2°C	2.81	2.22
6 Months @ 25± 2°C	2.70	2.25
9 Months @ 25± 2°C	2.75	2.25
12 Months @ 25± 2°C	2.70	2.25

The results indicate that the active ingredients are within the EPA Standard Certified Limits.

2. The Corrosion characteristics study is as follows:

Sample	Appearance	
	Formulation	Container
Initial (A, B, & C)	Pale yellow transparent liquid with no precipitation or sedimentation. Munsell Color 10 Y 9/1	1 liter white translucent plastic jar with a white translucent plastic screw on lid. No signs of corrosion or degradation.
3 Months @ 25± 2°C	Extremely pale yellow (almost colorless) transparent liquid with no precipitation or	1 liter white translucent plastic jar with a white translucent plastic screw on lid. No signs of corrosion, degradation or

	sedimentation.	see page.
6 Months @ 25± 2°C	Extremely pale yellow (almost colorless) transparent liquid with no precipitation or sedimentation.	1 liter white translucent plastic jar with a white translucent plastic screw on lid. No signs of corrosion, degradation or see page.
9 Months @ 25± 2°C	Extremely pale yellow (almost colorless) transparent liquid with no precipitation or sedimentation.	1 liter white translucent plastic jar with a white translucent plastic screw on lid. No signs of corrosion, degradation or see page.
12 Months @ 25± 2°C	Extremely pale yellow (almost colorless) transparent liquid with no precipitation or sedimentation.	1 liter white translucent plastic jar with a white translucent plastic screw on lid. No signs of corrosion, degradation or see page.

## CONCLUSIONS:

The OPPTS 830.6317 (Storage Stability) and OPPTS 830.6320 (Corrosion Characteristics) studies are acceptable. Assays indicated that the values are within the EPA Standard Certified Limits.

# DATA PACKAGE BEAN SHEET

Date: 14-Nov-2012

Page 1 of 1

Decision #: 471807

DP #: (406822)

NON PRIA

Parent DP #:

Submission #: 925529

E-Sub #:

## \*\*\* Registration Information \*\*\*

Registration: **83451-22 - BELLACIDE 301**

Company: 83451 - BWA WATER ADDITIVES US LLC

Risk Manager: RM 31 - Velma Noble - (703) 308-6233 Room# PY1 S-8855

Risk Manager Reviewer: Cletis Mixon CMIXON

Sent Date: 16-Oct-2012

PRIA Due Date: 14-Jan-2013

Edited Due Date: \_\_\_\_\_

Type of Registration: Product Registration - Section 3

Action Desc: (362) FORMULA CHANGE; TECHNICAL;

Ingredients: 128824, Tri-n-butyl tetradecyl phosphonium chloride(2.78%)

069183, Poly(oxy-1,2-ethanediyl(dimethylimino)-1,2-ethanediyl(dimethylimino)-1,2-ethanediyl dichloride)(2.22%)

## \*\*\* Data Package Information \*\*\*

Expedite: ☐ Yes ☒ No

Date Sent: 14-Nov-2012

Due Back: \_\_\_\_\_

DP Ingredient: 069183, Poly(oxy-1,2-ethanediyl(dimethylimino)-1,2-ethanediyl(dimethylimino)-1,2-ethanediyl di

128824, Tri-n-butyl tetradecyl phosphonium chloride

DP Title: Review for Storage Stability

CSF Included: ☐ Yes ☒ No

Label Included: ☐ Yes ☒ No

Parent DP #: \_\_\_\_\_

### Assigned To

Date In

Date Out

Organization: AD / PSB

Last Possible Science Due Date: 30-Nov-2012

Team Name: CTT

Science Due Date: 12/31/12 11/16/12

Reviewer Name: Juan

11/15/12  
20

01/8/13

Sub Data Package Due Date: 1/14/13 11/16/12

Contractor Name: \_\_\_\_\_

## \*\*\* Studies Sent for Review \*\*\*

No Studies

## \*\*\* Additional Data Package for this Decision \*\*\*

No Additional Data Packages

## \*\*\* Data Package Instructions \*\*\*

Registrant has submitted Chemistry Data to be reviewed. MRID #489701901



L → 11/5/12 → 2 78% TTPC  
2 2 Poly...

## Memorandum

Date: 11 / 6 / 12

To: PM 31, Regulatory Manager

From: Information Services Branch, ITRMD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted to OPPIN.

**We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.**

If you have any questions about this process, please contact Teresa Downs (305-5363).

This is a: ☒ fully accepted submission  
☐ partially accepted submission  
☐ rejected submission

Document #1

Bellacide 301: Determination of Storage Stability and Corrosion Characteristics

Actives: TFC and WSCP

EPA Reg. No. 83401 - 22

Guideline No. 830.6317 and 830.6320

MRID No. 48970901

**Bellacide 301:**

**DETERMINATION OF  
STORAGE STABILITY AND CORROSION  
CHARACTERISTICS**

**PROJECT NUMBER: 41102312**

**DATA REQUIREMENTS:**

**US EPA OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION  
(OCSPP), SERIES 830: PRODUCT PROPERTIES TEST GUIDELINES**

**AUTHORS:** A J Woolley  
D F White

**DATE OF COMPLETION:**  
03 October 2012

**STUDY SPONSOR:**

BWA Water Additives UK Limited  
2 Brightgate Way  
Manchester  
M32 0TB  
UNITED KINGDOM

**TEST FACILITY:**

Harlan Laboratories Ltd  
Shardlow Business Park  
Shardlow  
Derbyshire  
DE72 2GD  
UK

Telephone: +44 (0) 1332 792896

Facsimile: +44 (0) 1332 799018



Pages 45-75 - \*Access to FIFRA health and safety data is restricted under FIFRA section 10(g)\*



**BWA™**  
Water Additives

**48970900**

BWA Water Additives  
1979 Lakeside Parkway  
Suite 925  
Tucker, GA 30084

Tel 678 802 3050  
Fax 678 802 3024

Document Processing Desk (APPL)  
Office of Pesticide Programs (7504P)  
Room S4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

Attn: Ms. Velma Noble  
Product Manager 31

Re: Bellacide 301, EPA Reg. No. 83451-22  
OPPTS 830.6317 (Storage Stability) and  
OPPTS 830.6320 (Corrosion Characteristics),  
Data submission.

Ms. Noble,

BWA Water Additives, US LLC is submitting two outstanding data requirements (OPPTS 830.6317 (Storage Stability) and OPPTS 830.6320 (Corrosion Characteristics) pertaining to the EPA registration of Bellacide 301, EPA Reg. No. 83451-22.

BWA hopes the accompanying study, upon review and approval, will satisfy these outstanding data requirements.

Please find the following documents enclosed:

- Application 8570-1;
- Transmittal Document; and
- Final Report (3 copies):

**48970901** o *Bellacide 301: Determination of Storage Stability and Corrosion Characteristics.*

I look forward to the Agency's review. If you have any questions, please phone me at 678-802-3032 or you may contact our consultant, Dana Lateulere at 301-743-6050.

Thank you,

  
Ross Beattie

Product Registration Manager, BWA Water Additives  
p) 678-802-3032  
e) [ross.beattie@wateradditives.com](mailto:ross.beattie@wateradditives.com)

# DATA PACKAGE BEAN SHEET

Date: 14-Nov-2012

Page 1 of 1

Decision #: 471807

DP #: (406822)

NON PRIA

Parent DP #:

Submission #: 925529

E-Sub #:

## \*\*\* Registration Information \*\*\*

Registration: **83451-22 - BELLACIDE 301**

Company: 83451 - BWA WATER ADDITIVES US LLC

Risk Manager: RM 31 - Velma Noble - (703) 308-6233 Room# PY1 S-8855

Risk Manager Reviewer: Cletis Mixon CMIXON

Sent Date: 16-Oct-2012

PRIA Due Date: 14-Jan-2013

Edited Due Date: \_\_\_\_\_

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## \*\*\* Data Package Information \*\*\*

Expedite: ☐ Yes ☒ No

Date Sent: 14-Nov-2012

Due Back: \_\_\_\_\_

DP Ingredient: 069183, Poly(oxy-1,2-ethanediyl(dimethylimino)-1,2-ethanediyl(dimethylimino)-1,2-ethanediyl di

128824, Tri-n-butyl tetradecyl phosphonium chloride

DP Title: Review for Storage Stability

CSF Included: ☐ Yes ☒ No

Label Included: ☐ Yes ☒ No

Parent DP #: \_\_\_\_\_

### Assigned To

Date In

Date Out

Organization: AD / PSB

Last Possible Science Due Date: 30-Nov-2012

Team Name: CTT

Science Due Date: \_\_\_\_\_

Reviewer Name: \_\_\_\_\_

Sub Data Package Due Date: \_\_\_\_\_

Contractor Name: \_\_\_\_\_

## \*\*\* Studies Sent for Review \*\*\*

No Studies

## \*\*\* Additional Data Package for this Decision \*\*\*

No Additional Data Packages

## \*\*\* Data Package Instructions \*\*\*

Registrant has submitted Chemistry Data to be reviewed. MRID #489701901



**BWA**™  
Water Additives

48970900

BWA Water Additives  
1979 Lakeside Parkway  
Suite 925  
Tucker, GA 30084

Tel 678 802 3050  
Fax 678 802 3024

Document Processing Desk (APPL)  
Office of Pesticide Programs (7504P)  
Room S4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

Attn: Ms. Velma Noble  
Product Manager 31

Re: Bellacide 301, EPA Reg. No. 83451-22  
OPPTS 830.6317 (Storage Stability) and  
OPPTS 830.6320 (Corrosion Characteristics),  
Data submission.

Ms. Noble,

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I look forward to the Agency's review. If you have any questions, please phone me at 678-802-3032 or you may contact our consultant, Dana Lateulere at 301-743-6050.

Thank you,

Ross Beattie

Product Registration Manager, BWA Water Additives

p) 678-802-3032

e) ross.beattie@wateradditives.com

**RISK ASSIGNMENT FORM**  
Antimicrobial Division/Regulatory Management Branch I

<b>A</b>		Completed by Product Manager					
PRODUCT REVIEWER: <i>Cletis</i>					RMBI <u>TEAM 31</u>		
Type of Action: <i>Storage stability &amp; Corrosion characteristics</i>					EPA File Symbol/Reg No. <i>83451-22</i>		
Decision No. <i>471807</i>		Submission No. <i>925529</i>		Fee for Service Action Code:			
FQPA Action Code: <i>362</i>		Non-FQPA Action Code:		PRIA FEE AMOUNT:			
	MONTH	DAY	YEAR				
APPLICATION DATE	<i>10</i>	<i>12</i>	2012				
EPA PIN DATE	<i>10</i>	<i>16</i>	2012				
DATE PM RECEIVED FROM FRONT END			2012				
DATE SENT TO SCIENCE							
DATE RECEIVED FROM SCIENCE							
DATE DUE TO PM							
Type of Data:	<del>PSB Product Chemistry</del>	PSB Acute Toxicology	PSB Efficacy	RASSB Environmental Fate	RASSB Ecological Effects	RASSB Chronic Toxicology	RASSB Exposure/Residue
<i>Kurz - Chem. sty - Registrant has submitted chem. sty data to be reviewed. MRID# 48970901</i>							
ATTACHMENTS: LABELING e-CSF(S) e-DATA e-OTHERS							
<b>B</b>		For Arctic Slope Contract Only					
Contract No.: 0052		ARCTIC SLOPE/MANAGER					
Final Task: Signature _____		_____ (Total hrs)					
<b>C</b>		Reviewer Comments:					
DATE FEE PAID:		RESPONSE CODE:		RESPONSE DATE:			





**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
WASHINGTON, D.C. 20460

October 23, 2012

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

BWA WATER ADDITIVES US LLC  
1979 LAKESIDE PARKWAY, SUITE 925  
TUCKER, GA 30084

**Report of Analysis for Compliance with PR Notice 11-03**

Thank you for your submittal of 16-OCT-12. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 11-03. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

# Receipt for Section 3

S: 825528

Resubmission: ☒ Yes ☐ No

Regulatory Type: Product Registration - Section 3

Fee For Service: ☐ Yes ☒ No

Application Type: Amendment

Billable: ☐ Yes ☒ No

Company: 83451 BWA WATER ADDITIVES US LLC



Risk Manager: Antimicrobials Division, Risk Management Team 31

Product #: 83451-22 Product Name: BELLACIDE 301

Override#:

Me Too

Me Too

Section3:

Product Name:

Application Date: 12-Oct-2012



OPP Rec'd Date: 16-Oct-2012



Front End Date: 16-Oct-2012



Risk Manager Send Date: 16-Oct-2012



FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

storage stability & corrosion characteristics data

New Ingredient

Request Date:

New Ingredient

Received Date:

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Print Letter

Enter More Information

Tracking

Receipt Content

Des

Study

View/Edit



**BWA™**  
Water Additives

**48970900**

BWA Water Additives  
1979 Lakeside Parkway  
Suite 925  
Tucker, GA 30084

Tel 678 802 3050  
Fax 678 802 3024

Document Processing Desk (APPL)  
Office of Pesticide Programs (7504P)  
Room S4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

Attn: Ms. Velma Noble  
Product Manager 31

Re: Bellacide 301, EPA Reg. No. 83451-22  
OPPTS 830.6317 (Storage Stability) and  
OPPTS 830.6320 (Corrosion Characteristics),  
Data submission.

Ms. Noble,

BWA Water Additives, US LLC is submitting two outstanding data requirements (OPPTS 830.6317 (Storage Stability) and OPPTS 830.6320 (Corrosion Characteristics) pertaining to the EPA registration of Bellacide 301, EPA Reg. No. 83451-22.

BWA hopes the accompanying study, upon review and approval, will satisfy these outstanding data requirements.

Please find the following documents enclosed:

- Application 8570-1;
- Transmittal Document; and
- Final Report (3 copies):

**48970901** o *Bellacide 301: Determination of Storage Stability and Corrosion Characteristics.*

I look forward to the Agency's review. If you have any questions, please phone me at 678-802-3032 or you may contact our consultant, Dana Lateulere at 301-743-6050.

Thank you,

  
Ross Beattie

Product Registration Manager, BWA Water Additives

p) 678-802-3032

e) ross.beattie@wateradditives.com

# Administrative Materials



United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☐ Amendment  
☒ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number 83451-22	2. EPA Product Manager Velma Noble	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Bellacide 301	PM# 31	
5. Name and Address of Applicant (Include ZIP Code) BWA Water Additives US LLC 1979 Lakeside Parkway, Suite 925 Tucker, GA 30084 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: <input checked="" type="checkbox"/> EPA Reg. No. _____ Product Name _____	

## Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Outstanding OPPTS 830.6317 (Storage Stability) and OPPTS 830.6320 (Corrosion Characteristics) study requirements have been completed and are being submitted for review.

## Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
* Certification must be submitted				<input type="checkbox"/> Plastic	
	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container Bulk containers		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Dana S. Lateulere		Title Consultant		Telephone No. (Include Area Code) 301-743-6050	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)  ..... .....
2. Signature 		3. Title Product Registration Manager			
4. Typed Name Ross Beattie		5. Date October 12, 2012			

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*{All text in brackets [xxx] is optional and may or may not be included on a final label.}*  
*{All text in braces {xxx} is administrative and will not appear on a final label.}*

### BELLACIDE 301

For use as an algicide, bactericide, fungicide, for the control of algae, slime forming bacteria, sulfate reducing bacteria, and fungi in air-washers and industrial air scrubbing systems, recirculating cooling water and process water systems including cooling towers, evaporative coolers, brewery pasteurizers, can warmers, and hydrostatic sterilizers and retorts, non-food contact paper and paperboard process water (e.g.: brown paper, corrugated sheet, Kraft paper, newsprint, etc.), and enhanced oil recovery systems, oil and gas production and transmission pipelines and systems, gas storage wells and systems, hydrotesting of pipelines and tanks, pipeline pigging and scraping operations and oil and gas well drilling and maintenance fluids. FOR INDUSTRIAL APPLICATION using closed metered delivery systems ONLY. Open pouring is prohibited.

#### ACTIVE INGREDIENT:

Tributyl Tetradecyl Phosphonium Chloride

2.78%

Poly[oxyethylene(dimethyliminio)ethylene  
(dimethyliminio)ethylene dichloride]

2.22 %

#### OTHER INGREDIENTS:

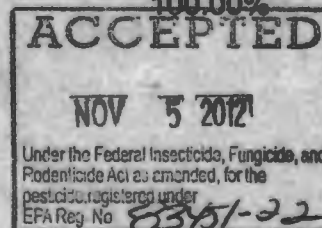
95.00 %

#### TOTAL:

100.00%

**KEEP OUT OF REACH OF CHILDREN**

**DANGER**



#### FIRST AID:

##### IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- Call a poison control center or doctor for treatment advice.

##### IF ON SKIN

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

##### IF INHALED:

- Move the person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.
- Call a poison control center or doctor for treatment advice.

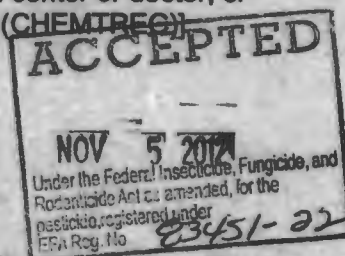
##### IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by the poison control center or doctor.
- Do not give anything by mouth to an unconscious person.



Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. [IN CASE OF EMERGENCY, CALL 1-800-424-9300 (CHEMTREC)]  
[telephone number supplied by supplemental registrant].]



### PRECAUTIONARY STATEMENTS

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS: DANGER.** Corrosive. Causes irreversible eye damage. Harmful if swallowed, inhaled or absorbed through the skin. Do not get in eyes or clothing. Avoid breathing spray mist. Wear protective eyewear (goggles, face shield, or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco. Remove and wash contaminated clothing before reuse. Avoid contact with skin, eyes or clothing. Wear long-sleeved shirt and long pants, socks, shoes and gloves. Prolonged or frequent repeated skin contact may cause allergic reaction in some individuals.

**PHYSICAL OR CHEMICAL HAZARDS:** Do not mix with other chemicals. Mix only with water.

**ENVIRONMENTAL HAZARDS:** This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

### DIRECTIONS FOR USE:

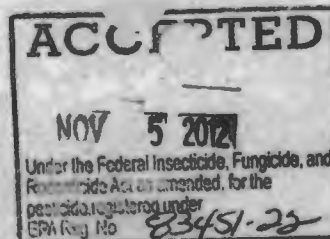
It is a violation of federal law to use this product in any manner inconsistent with its labeling. Read entire label and use strictly in accordance with precautionary statements and directions.

This product must be loaded and transferred only using a metering-pump system or a close loading/application system. Open pouring is prohibited.

Be sure to release any pressure in the container prior to fully opening. This can be done by loosening the closure prior to fully opening the container. DO NOT OPEN WITH FACE CLOSE TO THE CONTAINER OPENING.

### [RECIRCULATING COOLING AND PROCESS WATER SYSTEMS

When used as directed, this product effectively controls algal, bacterial, and fungal slimes in commercial and industrial cooling towers, evaporative condensers, evaporative coolers, closed loop heating and cooling systems and industrial process water systems. Add this product at a point of uniform mixing such as the basin area.



#### DOSAGE RATES FOR ABOVE APPLICATIONS.

Initial Dose: When the system is noticeably fouled, add ~~6.4 to 10.3~~ 34.6 to ~~103.7~~ 103.7 fluid ounces of product per 1000 gallons (~~40 to 81~~ 270 to 810 milliliters/1000 liters) of water contained in the system. Repeat until control is achieved.

Subsequent Dose: When microbial control is evident, add ~~10.3 to 51.8~~ 10.3 to 51.8 fluid ounces of product per 1000 gallons (~~40 to 405~~ 81 to 405 milliliters/1000 liters) of water contained in the system. Repeat as needed to maintain control.

Heavily fouled systems must be cleaned before treatment is begun.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

#### [AIR WASHERS AND INDUSTRIAL AIR SCRUBBING SYSTEMS

When used as directed, this product effectively controls algal, bacterial, and fungal slimes in air washing systems equipped with a mist eliminator and industrial air scrubbing systems. Add this product at a point of uniform mixing.

#### DOSAGE RATES FOR ABOVE APPLICATIONS.

Initial Dose: When the system is noticeably fouled, add ~~6.4 to 10.3~~ 34.6 to 103.7 fluid ounces of product per 1000 gallons (~~50 to 150~~ 270 to 810 milliliters/1000 liters) of water contained in the system. Repeat until control is achieved.

Subsequent Dose: When microbial control is evident, add ~~4.0 to 20.9~~ 10.3 to 51.8 fluid ounces of product per 1000 gallons (~~15 to 150~~ 81 to 405 milliliters/1000 liters) of water contained in the system. Repeat as needed to maintain control.

Heavily fouled systems must be cleaned before treatment is begun.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

#### [HEAT TRANSFER SYSTEMS

When used as directed, this product effectively controls algal, bacterial, and fungal slimes in brewery pasteurizers, bottle and can warmers and hydrostatic sterilizers and retorts. Add this product at a point of uniform mixing.

#### DOSAGE RATES FOR ABOVE APPLICATIONS.

Initial Dose: When the system is noticeably fouled, add ~~6.4 to 10.3~~ 34.6 to 103.7 fluid ounces of product per 1000 gallons (~~50 to 150~~ 270 to 810 milliliters/1000 liters) of water contained in the system. Repeat until control is achieved.

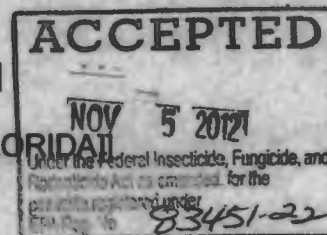


5/8  
4

Subsequent Dose: When microbial control is evident, add ~~1.9 to 9.6~~ 10.3 to 51.8 fluid ounces of product per 1000 gallons (~~15 to 75~~ 81 to 405 milliliters/1000 liters) of water contained in the system. Repeat as needed to maintain control.

Heavily fouled systems must be cleaned before treatment is begun.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]



**[PULP, PAPER, AND PAPERBOARD MILLS:**

THIS PRODUCT IS ONLY FOR USE IN NON-FOOD APPLICATION, such as Brown Paper Mills, Sheet for Corrugated Board, Kraft Paper, Newsprint and similar paper / paperboard not intended for food contact uses. When used as directed this product effectively controls bacterial and fungal slimes in pulp, paper, and paperboard mill process water systems including white water systems. Treat water at critical areas in the system where mixing of the product will be uniform such as beaters, furnish chest, white-water tank, save-all, and broke chest. The frequency and duration of the treatment will depend upon the severity of the problem.

**DOSAGE RATES.**

Initial Dose: When the system is noticeably fouled, add ~~0.52.7 to 3.0~~ 16.2 pounds of this product per ton of pulp or paper (dry basis) as a slug dose. Repeat until control is achieved. Heavily fouled systems must be cleaned before initial treatment.

Subsequent Dose: When biological control is evident, add ~~0.31.6 to 2.0~~ 10.8 pounds of product per ton of pulp or paper (dry basis) as a slug dose as necessary to maintain control.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

**[ENHANCED OIL RECOVERY SYSTEMS:**

NOT FOR USE IN ESTUARINE OR MARINE OIL RECOVERY SYSTEMS. When used as directed this product effectively controls slime-forming and sulfate-reducing bacteria in injection and produced water systems, water disposal systems, and other oilfield water systems. Treat water at critical points in the system such as water or oil storage tanks, surge tanks, oil-water separators, before or after injection pumps, and injection well headers.

**DOSAGE RATES FOR ENHANCED OIL RECOVERY SYSTEMS.**

When the system is noticeably fouled, or to maintain control in the system, add ~~4.222.7 to 63~~ 340.2 gallons of this product per 1000 barrels of water as a slug dose for 1-8 hours per day, 1-4 times per week.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

**[OIL AND GAS PRODUCTION AND TRANSMISSION PIPELINES AND SYSTEMS:**

This product must be added at a point in the pipeline where uniform mixing will occur. Conduct the application to ensure maximum distribution of product through the entire internal surface of the pipeline. Follow dosing instructions for enhanced oil recovery systems.]

**[GAS STORAGE WELLS AND SYSTEMS:**

Individual injection wells must be treated with a sufficient quantity of product to produce a concentration of ~~400-1500~~540-8100 ppm of this product when diluted by the water present in the formation. Repeat injections as needed to maintain control.

Individual drips must be treated with sufficient quantity of this product to produce a concentration of ~~400-1500~~540-8100 ppm of this product when diluted by the water present in the drips. Repeat injections as needed to maintain control.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

**[HYDROTESTING:**

Water used to hydrotest pipelines or vessels must contain ~~400-1500~~540-8100 ppm of product, depending on water quality and length of time the equipment will remain idle.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

**[PIPELINE PIGGING AND SCRAPING OPERATIONS**

Add this product to a slug of water immediately following the scraper (ideally this water volume can be kept to a minimum and contained between the scraper and a trailing pig).

Add sufficient product to produce a concentration of ~~400-1500~~540-8100 ppm of this product in the water at the discharge point or pig trap depending on the length of the pipeline and the severity of biofouling.]

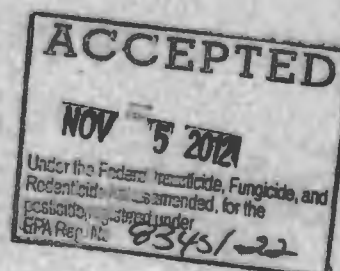
[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

**[DRILLING, PACKER, COMPLETION, WORKOVER AND FRACTURING FLUIDS:**

This product must be added to these fluids at a point where uniform mixing will occur.

Add ~~400-1500~~540-8100 ppm of this product to a freshly prepared fluid depending on the severity of contamination.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]



## STORAGE AND DISPOSAL:

Do not contaminate water, food, or feed by storage and disposal.

**PESTICIDE STORAGE:** Keep product dry and store in a cool dry well-ventilated area away from heat or open flame. Store in original container.

**PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

*{Text for non-refillable containers}*

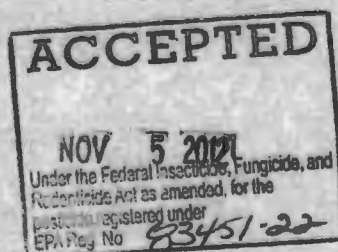
**CONTAINER DISPOSAL:** Non-refillable container. Do not reuse or refill this container. Offer for recycling, if available. If not, puncture and dispose of in a sanitary landfill or by other procedures approved by state and local authorities. Triple rinse container (or equivalent) promptly after emptying.

*{For containers of 5 gallons or less}* [Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.]

*{For containers with capacities of greater than 5 gallons}* [Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.]

*{Text for refillable containers}*

**CONTAINER DISPOSAL:** Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.





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NOTE: Buyer assumes all responsibility for safety and use not in accordance with directions.

Manufactured for:  
BWA Water Additives US LLC  
1979 Lakeside Parkway, Suite 925  
Tucker, GEORGIA 30084

EPA REG. # 83451-22  
EPA EST. # 1448-TN-01

NET WEIGHT: ## lbs (##kg)

RECEIVED  
NOV 5 2012  
EPA REG. NO. 83451-22  
EPA EST. NO. 1448-TN-01

**ACCEPTED**  
NOV 5 2012  
Under the Federal Insecticide, Fungicide, and  
Rodenticide Act as amended, for the  
pesticide, registered under  
EPA Reg. No. 83451-22

# Material Sent for Data Extraction

Reg # 83451-2a

Description: \_\_\_\_\_

☒ Material(s) Sent to Data Extraction Contractors:

☒ New Stamped Label Dated \_\_\_\_\_

☐ Notification Dated \_\_\_\_\_

☐ New CSF(s) Dated \_\_\_\_\_

☐ Other: \_\_\_\_\_

☐ Decision #: \_\_\_\_\_

☐ Other Action/Comments: \_\_\_\_\_

\_\_\_\_\_  
Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer: D. Copeland

Phone: \_\_\_\_\_ Division: RED

Date: 11/5/12

Created February 3, 2011

Mr. Ross Beattie  
Product Registration Specialist  
BWA Water Additives US LLC  
1979 Lakeside parkway, Suite 925  
Tucker, GA, 30084

Subject: **Bellacide 301**  
EPA Registration Number 83451-22  
Application Dated August 20, 2012  
EPA Received Date August 24, 2012

Dear Mr. Beattie:

The following amendment submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable.

**Proposed Amendment:**

- Label amendment

**General Comment:**

A stamped copy of the acceptable labeling is enclosed. Submit one (1) copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please contact Drusilla Copeland at (703) 308-6224.

Sincerely,



Velma Noble  
Product Manager (31)  
Regulatory Management Branch I  
Antimicrobials Division (7510P)

CONCURRENCES							
SYMBOL	closure: stamped label						
SURNAME							
DATE							

{All text in brackets [xxx] is optional and may or may not be included on a final label.}  
{All text in braces {xxx} is administrative and will not appear on a final label.}

## BELLACIDE 301

For use as an algicide, bactericide, fungicide, for the control of algae, slime forming bacteria, sulfate reducing bacteria, and fungi in air-washers and industrial air scrubbing systems, recirculating cooling water and process water systems including cooling towers, evaporative coolers, brewery pasteurizers, can warmers, and hydrostatic sterilizers and retorts, non-food contact paper and paperboard process water (e.g.: brown paper, corrugated sheet, Kraft paper, newsprint, etc.), and enhanced oil recovery systems, oil and gas production and transmission pipelines and systems, gas storage wells and systems, hydrotesting of pipelines and tanks, pipeline pigging and scraping operations and oil and gas well drilling and maintenance fluids. FOR INDUSTRIAL APPLICATION using closed metered delivery systems ONLY. Open pouring is prohibited.

### ACTIVE INGREDIENT:

Tributyl Tetradecyl Phosphonium Chloride

2.78%

Poly[oxyethylene(dimethyliminio)ethylene  
(dimethyliminio)ethylene dichloride]

2.22 %

### OTHER INGREDIENTS:

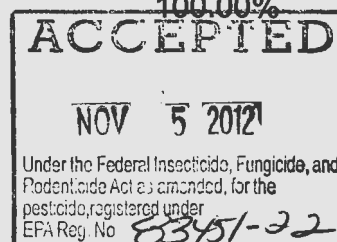
95.00 %

### TOTAL:

100.00%

KEEP OUT OF REACH OF CHILDREN

**DANGER**



### FIRST AID:

#### IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- Call a poison control center or doctor for treatment advice.

#### IF ON SKIN

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

#### IF INHALED:

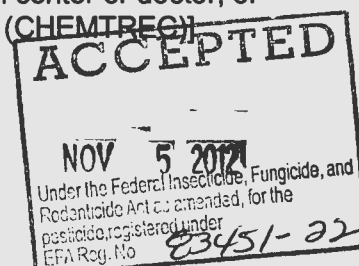
- Move the person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.
- Call a poison control center or doctor for treatment advice.

#### IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by the poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. [IN CASE OF EMERGENCY, CALL 1-800-424-9300 (CHEMTREC)]  
[telephone number supplied by supplemental registrant].]



## PRECAUTIONARY STATEMENTS

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS: DANGER.** Corrosive. Causes irreversible eye damage. Harmful if swallowed, inhaled or absorbed through the skin. Do not get in eyes or clothing. Avoid breathing spray mist. Wear protective eyewear (goggles, face shield, or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco. Remove and wash contaminated clothing before reuse. Avoid contact with skin, eyes or clothing. Wear long-sleeved shirt and long pants, socks, shoes and gloves. Prolonged or frequent repeated skin contact may cause allergic reaction in some individuals.

**PHYSICAL OR CHEMICAL HAZARDS:** Do not mix with other chemicals. Mix only with water.

**ENVIRONMENTAL HAZARDS:** This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

## DIRECTIONS FOR USE:

**It is a violation of federal law to use this product in any manner inconsistent with its labeling.** Read entire label and use strictly in accordance with precautionary statements and directions.

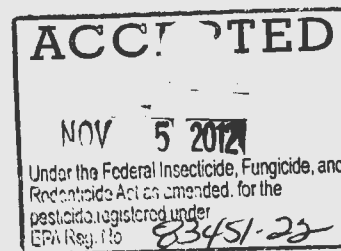
**This product must be loaded and transferred only using a metering pump system or a close loading/application system. Open pouring is prohibited.**

Be sure to release any pressure in the container prior to fully opening. This can be done by loosening the closure prior to fully opening the container. **DO NOT OPEN WITH FACE CLOSE TO THE CONTAINER OPENING.**

## [RECIRCULATING COOLING AND PROCESS WATER SYSTEMS

When used as directed, this product effectively controls algal, bacterial, and fungal slimes in commercial and industrial cooling towers, evaporative condensers, evaporative coolers, closed loop heating and cooling systems and industrial process water systems. Add this product at a point of uniform mixing such as the basin area.



**DOSAGE RATES FOR ABOVE APPLICATIONS.**

Initial Dose: When the system is noticeably fouled, add ~~6.4 to 10.3~~ 34.6 to 103.7 fluid ounces of product per 1000 gallons (~~50 to 150~~ 270 to 810 milliliters/1000 liters) of water contained in the system. Repeat until control is achieved.

Subsequent Dose: When microbial control is evident, add ~~10.3 to 51.8~~ 10.3 to 51.8 fluid ounces of product per 1000 gallons (~~75 to 405~~ 81 to 405 milliliters/1000 liters) of water contained in the system. Repeat as needed to maintain control.

Heavily fouled systems must be cleaned before treatment is begun.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

**[AIR WASHERS AND INDUSTRIAL AIR SCRUBBING SYSTEMS**

When used as directed, this product effectively controls algal, bacterial, and fungal slimes in air washing systems equipped with a mist eliminator and industrial air scrubbing systems. Add this product at a point of uniform mixing.

**DOSAGE RATES FOR ABOVE APPLICATIONS.**

Initial Dose: When the system is noticeably fouled, add ~~6.4 to 10.3~~ 34.6 to 103.7 fluid ounces of product per 1000 gallons (~~50 to 150~~ 270 to 810 milliliters/1000 liters) of water contained in the system. Repeat until control is achieved.

Subsequent Dose: When microbial control is evident, add ~~10.3 to 51.8~~ 10.3 to 51.8 fluid ounces of product per 1000 gallons (~~75 to 405~~ 81 to 405 milliliters/1000 liters) of water contained in the system. Repeat as needed to maintain control.

Heavily fouled systems must be cleaned before treatment is begun.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

**[HEAT TRANSFER SYSTEMS**

When used as directed, this product effectively controls algal, bacterial, and fungal slimes in brewery pasteurizers, bottle and can warmers and hydrostatic sterilizers and retorts. Add this product at a point of uniform mixing.

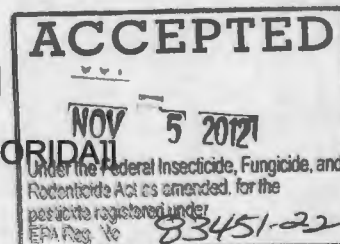
**DOSAGE RATES FOR ABOVE APPLICATIONS.**

Initial Dose: When the system is noticeably fouled, add ~~6.4 to 10.3~~ 34.6 to 103.7 fluid ounces of product per 1000 gallons (~~50 to 150~~ 270 to 810 milliliters/1000 liters) of water contained in the system. Repeat until control is achieved.

Subsequent Dose: When microbial control is evident, add ~~1.9 to 9.6~~10.3 to 51.8 fluid ounces of product per 1000 gallons (~~15 to 75~~81 to 405 milliliters/1000 liters) of water contained in the system. Repeat as needed to maintain control.

Heavily fouled systems must be cleaned before treatment is begun.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]



#### [PULP, PAPER, AND PAPERBOARD MILLS:

THIS PRODUCT IS ONLY FOR USE IN NON-FOOD APPLICATION, such as Brown Paper Mills, Sheet for Corrugated Board, Kraft Paper, Newsprint and similar paper / paperboard not intended for food contact uses. When used as directed this product effectively controls bacterial and fungal slimes in pulp, paper, and paperboard mill process water systems including white water systems. Treat water at critical areas in the system where mixing of the product will be uniform such as beaters, furnish chest, white-water tank, save-all, and broke chest. The frequency and duration of the treatment will depend upon the severity of the problem.

#### DOSAGE RATES.

Initial Dose: When the system is noticeably fouled, add ~~0.5~~2.7 to ~~3.0~~16.2 pounds of this product per ton of pulp or paper (dry basis) as a slug dose. Repeat until control is achieved. Heavily fouled systems must be cleaned before initial treatment.

Subsequent Dose: When biological control is evident, add ~~0.3~~1.6 to ~~2.0~~10.8 pounds of product per ton of pulp or paper (dry basis) as a slug dose as necessary to maintain control.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

#### [ENHANCED OIL RECOVERY SYSTEMS:

NOT FOR USE IN ESTUARINE OR MARINE OIL RECOVERY SYSTEMS. When used as directed this product effectively controls slime-forming and sulfate-reducing bacteria in injection and produced water systems, water disposal systems, and other oilfield water systems. Treat water at critical points in the system such as water or oil storage tanks, surge tanks, oil-water separators, before or after injection pumps, and injection well headers.

#### DOSAGE RATES FOR ENHANCED OIL RECOVERY SYSTEMS.

When the system is noticeably fouled, or to maintain control in the system, add ~~4.2~~22.7 to ~~63~~340.2 gallons of this product per 1000 barrels of water as a slug dose for 1-8 hours per day, 1-4 times per week.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

**[OIL AND GAS PRODUCTION AND TRANSMISSION PIPELINES AND SYSTEMS:**

This product must be added at a point in the pipeline where uniform mixing will occur. Conduct the application to ensure maximum distribution of product through the entire internal surface of the pipeline. Follow dosing instructions for enhanced oil recovery systems.]

**[GAS STORAGE WELLS AND SYSTEMS:**

Individual injection wells must be treated with a sufficient quantity of product to produce a concentration of ~~100-1500~~540-8100 ppm of this product when diluted by the water present in the formation. Repeat injections as needed to maintain control.

Individual drips must be treated with sufficient quantity of this product to produce a concentration of ~~100-1500~~540-8100 ppm of this product when diluted by the water present in the drips. Repeat injections as needed to maintain control.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

**[HYDROTESTING:**

Water used to hydrotest pipelines or vessels must contain ~~100-1500~~540-8100 ppm of product, depending on water quality and length of time the equipment will remain idle.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

**[PIPELINE PIGGING AND SCRAPING OPERATIONS**

Add this product to a slug of water immediately following the scraper (ideally this water volume can be kept to a minimum and contained between the scraper and a trailing pig).

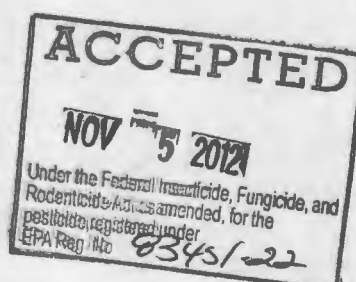
Add sufficient product to produce a concentration of ~~100-1500~~540-8100 ppm of this product in the water at the discharge point or pig trap depending on the length of the pipeline and the severity of biofouling.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

**[DRILLING, PACKER, COMPLETION, WORKOVER AND FRACTURING FLUIDS:**

This product must be added to these fluids at a point where uniform mixing will occur. Add ~~100-1500~~540-8100 ppm of this product to a freshly prepared fluid depending on the severity of contamination.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]



## STORAGE AND DISPOSAL:

Do not contaminate water, food, or feed by storage and disposal.

**PESTICIDE STORAGE:** Keep product dry and store in a cool dry well-ventilated area away from heat or open flame. Store in original container.

**PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

*{Text for non-refillable containers}*

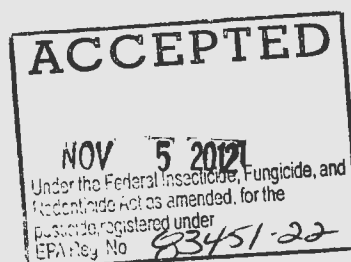
**CONTAINER DISPOSAL:** Non-refillable container. Do not reuse or refill this container. Offer for recycling, if available. If not, puncture and dispose of in a sanitary landfill or by other procedures approved by state and local authorities. Triple rinse container (or equivalent) promptly after emptying.

*{For containers of 5 gallons or less}* [Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.]

*{For containers with capacities of greater than 5 gallons}* [Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.]

*{Text for refillable containers}*

**CONTAINER DISPOSAL:** Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

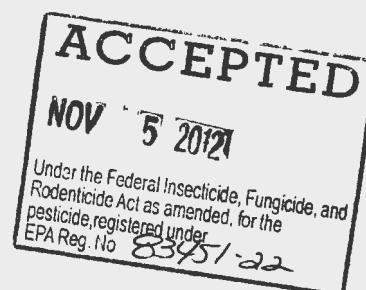
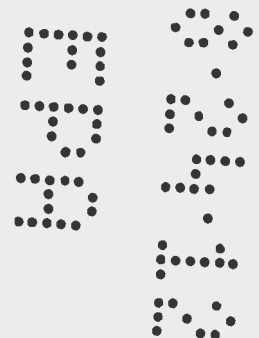


NOTE: Buyer assumes all responsibility for safety and use not in accordance with directions.

Manufactured for:  
BWA Water Additives US LLC  
1979 Lakeside Parkway, Suite 925  
Tucker, GEORGIA 30084

EPA REG. # 83451-22  
EPA EST. # 1448-TN-01

NET WEIGHT: ## lbs (##kg)





BWA Water Additives  
1979 Lakeside Parkway  
Suite 925  
Tucker, GA 30084  
Tel 678 802 3050  
Fax 678 802 3024

August 20, 2012

Document Processing Desk (AMEND)  
Office of Pesticide Programs (7504P)  
U. S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202

Re: **Bellacide 301**  
**EPA Registration No.: 83451-22**

Sir/Madam:

Please process the enclosed amendment for the above referenced product. The purpose of this amendment is to increase the dose rates that are included on the labeling for EPA Reg. No. 83451-22 (Bellacide 301).

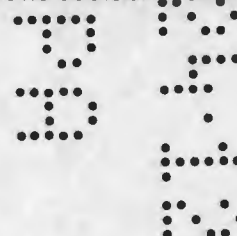
Bellacide 301 is a 5.4 times dilution of Bellacide 303 (EPA Reg. No. 83451-20), therefore the end user should use 5.4 times more Bellacide 301 than Bellacide 303 to maintain the same level of efficacy.

Unfortunately, the dosing levels of both products are currently identical, the volume of Bellacide 301 to be used for a particular end-use was not increased to compensate for the dilution factor.

BWA Water Additives would like to amend the current Stamped Accepted Labeling, dated July 25, 2012, to include dosing rates for the Bellacide 301 label that are equal in terms of Active Ingredient concentration to those of the Bellacide 303 dosing rates.

Please review the attached Bellacide 301 label that has incorporated a 5.4 times increase in the dosing levels, when the product is does by weight, volume or ppm product.

Because this is a purely academic exercise, where we are simply multiplying the dosing rates of the diluted product by the same factor by which it was diluted, BWA Water Additives feels that this product is eligible for a Fast-Track Amendment to the product labeling as BWA feels that no additional data needs to be provided/reviewed.





**BWA™**  
Water Additives

BWA Water Additives  
1979 Lakeside Parkway  
Suite 925  
Tucker, GA 30084

Tel 678 802 3050  
Fax 678 802 3024

August 20, 2012

Document Processing Desk (AMEND)  
Office of Pesticide Programs (7504P)  
U. S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202

Re: **Bellacide 301**  
**EPA Registration No.: 83451-22**

Enclosed in this Amendment package please find:

1. Application for Pesticide (EPA Form 8570-1); and
2. Five (5) copies of proposed Bellacide 301 (EPA Re. No. 83451-12) labeling
3. One copy of current, incorrect labeling.

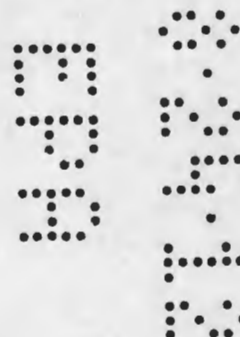
If you have any questions, please call me at 678-802-3032.

Thank you for your attention to this matter.

Sincerely,

Ross Beattie  
Product Registration Specialist  
BWA Water Additives  
p)678-802-3032  
f)678-802-3024

Enclosures





United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☒ Amendment  
☐ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number 83451-22	2. EPA Product Manager Velma Noble	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Bellacide 301	PM# 31	
5. Name and Address of Applicant (Include ZIP Code) BWA Water Additives US LLC 1979 Lakeside Parkway, Suite 925 Tucker GA, 30084  <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____  Product Name _____	

## Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Fee Determination: Fee Category - Not Applicable (Amendment) ross.beattie@wateradditives.com

This submission is to amend the dose rates included on the labeling for EPA Reg. No. 83451-22 (Bellacide 301). Bellacide 301 is a 5.4X dilution of EPA Reg. No. 83451-20 (Bellacide 303), but both labels have identical dose rates. Bellacide 301 dose rates should be 5.4X higher than Bellacide 303, when dose rates are given by volume, weight or ppm of product. Please see cover letter for additional details.

## Section - III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		5. Location of Label Directions <input type="checkbox"/> on label	

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Ross Beattie	Title Product Registration Specialist	Telephone No. (Include Area Code) 678-802-3032
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Product Registration Specialist	
4. Typed Name Ross Beattie	5. Date August 20, 2012	





U.S. ENVIRONMENTAL PROTECTION  
AGENCY

Office of Pesticide Programs  
Antimicrobials Division (7510P)  
1200 Pennsylvania Avenue NW  
Washington, D.C. 20460

NOTICE OF PESTICIDE:

☒ Registration  
☐ Reregistration

(under FIFRA, as amended)

EPA Reg.  
Number:

83451-22

Date of Issuance:

JUL 25 2012

Term of Issuance:

Unconditional

Name of Pesticide Product:

Bellacide 301

Name and Address of Registrant (include ZIP Code):

BWA Water Additives US LLC  
1979 Lakeside Parkway, Suite 925  
Tucker GA, 30084

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product (OPP Decision No. D-401439) is conditionally registered in accordance with FIFRA sec 3(c)(7)(A) provided that you:

1. Submit and/or cite all data required for registration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for re-registration of your product under FIFRA section 4.

2. Make the labeling changes listed below before you release the product for shipment:

a. Revise the "EPA Registration Symbol to read, "EPA Reg. No."83451-22

Signature of Approving Official:

Date: JUL 25 2012

CONCURRENCES

SYMBOL: Noble  
Product Manager Team-31  
Regulatory Management Branch  
Antimicrobials Division (7510P)

3. Submit three (3) copies of your final printed labeling before distributing or selling the product bearing the revised labeling.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records. Should you have any questions regarding this letter, please contact.

Sincerely,

A handwritten signature in black ink, appearing to read 'Velma Noble', with a stylized flourish at the end.

Velma Noble  
Product Manager (31)  
Regulatory Management Branch  
Antimicrobials Division (7510P)

Enclosure: Label, Product Chemistry review approved dated 6/28/12

{All text in brackets [xxx] is optional and may or may not be included on a final label.}  
{All text in braces {xxx} is administrative and will not appear on a final label.}

## BELLACIDE 301

For use as an algicide, bactericide, fungicide, for the control of algae, slime forming bacteria, sulfate reducing bacteria, and fungi in air-washers and industrial air scrubbing systems, recirculating cooling water and process water systems including cooling towers, evaporative coolers, brewery pasteurizers, can warmers, and hydrostatic sterilizers and retorts, non-food contact paper and paperboard process water (e.g.: brown paper, corrugated sheet, Kraft paper, newsprint, etc.), and enhanced oil recovery systems, oil and gas production and transmission pipelines and systems, gas storage wells and systems, hydrotesting of pipelines and tanks, pipeline pigging and scraping operations and oil and gas well drilling and maintenance fluids. FOR INDUSTRIAL APPLICATION using closed metered delivery systems ONLY. Open pouring is prohibited.

### ACTIVE INGREDIENT:

Tributyl Tetradecyl Phosphonium Chloride 2.78%

Poly[oxyethylene(dimethyliminio)ethylene  
(dimethyliminio)ethylene dichloride] 2.22 %

OTHER INGREDIENTS: 95.00 %

TOTAL: 100.00%

KEEP OUT OF REACH OF CHILDREN

**DANGER**

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:  
JUL 25 2012

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. 63451-20

### FIRST AID:

#### IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- Call a poison control center or doctor for treatment advice.

#### IF ON SKIN

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice

#### IF INHALED:

- Move the person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.
- Call a poison control center or doctor for treatment advice.

#### IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by the poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. [IN CASE OF EMERGENCY, CALL 1-800-424-9300 (CHEMTREC)]  
[telephone number supplied by supplemental registrant].]

ACCEPTED  
RECOMMENDATIONS  
in EPA Letter Dated:  
JUL 25 2012

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. 83451-22

### PRECAUTIONARY STATEMENTS

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS: DANGER.** Corrosive. Causes irreversible eye damage. Harmful if swallowed, inhaled or absorbed through the skin. Do not get in eyes or clothing. Avoid breathing spray mist. Wear protective eyewear (goggles, face shield, or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco. Remove and wash contaminated clothing before reuse. Avoid contact with skin, eyes or clothing. Wear long-sleeved shirt and long pants, socks, shoes and gloves. Prolonged or frequent repeated skin contact may cause allergic reaction in some individuals.

**PHYSICAL OR CHEMICAL HAZARDS:** Do not mix with other chemicals. Mix only with water.

**ENVIRONMENTAL HAZARDS:** This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

### DIRECTIONS FOR USE:

**It is a violation of federal law to use this product in any manner inconsistent with its labeling.** Read entire label and use strictly in accordance with precautionary statements and directions.

**This product must be loaded and transferred only using a metering-pump system or a close loading/application system. Open pouring is prohibited.**

Be sure to release any pressure in the container prior to fully opening. This can be done by loosening the closure prior to fully opening the container. **DO NOT OPEN WITH FACE CLOSE TO THE CONTAINER OPENING.**

### [RECIRCULATING COOLING AND PROCESS WATER SYSTEMS

When used as directed, this product effectively controls algal, bacterial, and fungal slimes in commercial and industrial cooling towers, evaporative condensers, evaporative coolers, closed loop heating and cooling systems and industrial process water systems. Add this product at a point of uniform mixing such as the basin area.

JUL '25 2012

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, this pesticide,  
registered under EPA Reg. No. 83451-a2

#### **DOSAGE RATES FOR ABOVE APPLICATIONS.**

Initial Dose: When the system is noticeably fouled, add 6.4 to 19.2 fluid ounces of product per 1000 gallons (50 to 150 milliliters/1000 liters) of water contained in the system. Repeat until control is achieved.

Subsequent Dose: When microbial control is evident, add 1.9 to 9.6 fluid ounces of product per 1000 gallons (15 to 75 milliliters/1000 liters) of water contained in the system. Repeat as needed to maintain control.

Heavily fouled systems must be cleaned before treatment is begun.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

#### **[AIR WASHERS AND INDUSTRIAL AIR SCRUBBING SYSTEMS**

When used as directed, this product effectively controls algal, bacterial, and fungal slimes in air washing systems equipped with a mist eliminator and industrial air scrubbing systems. Add this product at a point of uniform mixing.

#### **DOSAGE RATES FOR ABOVE APPLICATIONS.**

Initial Dose: When the system is noticeably fouled, add 6.4 to 19.2 fluid ounces of product per 1000 gallons (50 to 150 milliliters/1000 liters) of water contained in the system. Repeat until control is achieved.

Subsequent Dose: When microbial control is evident, add 1.9 to 9.6 fluid ounces of product per 1000 gallons (15 to 75 milliliters/1000 liters) of water contained in the system. Repeat as needed to maintain control.

Heavily fouled systems must be cleaned before treatment is begun.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

#### **[HEAT TRANSFER SYSTEMS**

When used as directed, this product effectively controls algal, bacterial, and fungal slimes in brewery pasteurizers, bottle and can warmers and hydrostatic sterilizers and reforts. Add this product at a point of uniform mixing.

#### **DOSAGE RATES FOR ABOVE APPLICATIONS.**

Initial Dose: When the system is noticeably fouled, add 6.4 to 19.2 fluid ounces of product per 1000 gallons (50 to 150 milliliters/1000 liters) of water contained in the system. Repeat until control is achieved.

Subsequent Dose: When microbial control is evident, add 1.9 to 9.6 fluid ounces of product per 1000 gallons (15 to 75 milliliters/1000 liters) of water contained in the system. Repeat as needed to maintain control.

Heavily fouled systems must be cleaned before treatment is begun.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:  
7/17/25/2012  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended for the pesticide,  
EPA Reg. No. 82451-22

**[PULP, PAPER, AND PAPERBOARD MILLS:**

THIS PRODUCT IS ONLY FOR USE IN NON-FOOD APPLICATION, such as Brown Paper Mills, Sheet for Corrugated Board, Kraft Paper, Newsprint and similar paper / paperboard not intended for food contact uses. When used as directed this product effectively controls bacterial and fungal slimes in pulp, paper, and paperboard mill process water systems including white water systems. Treat water at critical areas in the system where mixing of the product will be uniform such as beaters, furnish chest, white-water tank, save-all, and broke chest. The frequency and duration of the treatment will depend upon the severity of the problem.

**DOSAGE RATES.**

Initial Dose: When the system is noticeably fouled, add 0.5 to 3.0 pounds of this product per ton of pulp or paper (dry basis) as a slug dose. Repeat until control is achieved. Heavily fouled systems must be cleaned before initial treatment.

Subsequent Dose: When biological control is evident, add 0.3 to 2.0 pounds of product per ton of pulp or paper (dry basis) as a slug dose as necessary to maintain control.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

**[ENHANCED OIL RECOVERY SYSTEMS:**

NOT FOR USE IN ESTUARINE OR MARINE OIL RECOVERY SYSTEMS. When used as directed this product effectively controls slime-forming and sulfate-reducing bacteria in injection and produced water systems, water disposal systems, and other oilfield water systems. Treat water at critical points in the system such as water or oil storage tanks, surge tanks, oil-water separators, before or after injection pumps, and injection well headers.

**DOSAGE RATES FOR ENHANCED OIL RECOVERY SYSTEMS.**

When the system is noticeably fouled, or to maintain control in the system, add 4.2 to 63 gallons of this product per 1000 barrels of water as a slug dose for 1-8 hours per day, 1-4 times per week.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

**[OIL AND GAS PRODUCTION AND TRANSMISSION PIPELINES AND SYSTEMS:**

This product must be added at a point in the pipeline where uniform mixing will occur. Conduct the application to ensure maximum distribution of product through the entire internal surface of the pipeline. Follow dosing instructions for enhanced oil recovery systems.]

**[GAS STORAGE WELLS AND SYSTEMS:**

Individual injection wells must be treated with a sufficient quantity of product to produce a concentration of 100-1500ppm of this product when diluted by the water present in the formation. Repeat injections as needed to maintain control.

Individual drips must be treated with sufficient quantity of this product to produce a concentration of 100-1500 ppm of this product when diluted by the water present in the drips. Repeat injections as needed to maintain control.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

**[HYDROTESTING:**

Water used to hydrotest pipelines or vessels must contain 100-1500 ppm of product, depending on water quality and length of time the equipment will remain idle.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

**[PIPELINE PIGGING AND SCRAPING OPERATIONS**

Add this product to a slug of water immediately following the scraper (ideally this water volume can be kept to a minimum and contained between the scraper and a trailing pig). Add sufficient product to produce a concentration of 100-1500 ppm of this product in the water at the discharge point or pig trap depending on the length of the pipeline and the severity of biofouling.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

**[DRILLING, PACKER, COMPLETION, WORKOVER AND FRACTURING FLUIDS:**

This product must be added to these fluids at a point where uniform mixing will occur. Add 100-1500 ppm of this product to a freshly prepared fluid depending on the severity of contamination.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:  
JUL 25 2012

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. 83451-22

## STORAGE AND DISPOSAL:

Do not contaminate water, food, or feed by storage and disposal.

**PESTICIDE STORAGE:** Keep product dry and store in a cool dry well-ventilated area away from heat or open flame. Store in original container.

**PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

*{Text for non-refillable containers}*

**CONTAINER DISPOSAL:** Non-refillable container. Do not reuse or refill this container. Offer for recycling, if available. If not, puncture and dispose of in a sanitary landfill or by other procedures approved by state and local authorities. Triple rinse container (or equivalent) promptly after emptying.

*{For containers of 5 gallons or less}* [Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.]

*{For containers with capacities of greater than 5 gallons}* [Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.]

*{Text for refillable containers}*

**CONTAINER DISPOSAL:** Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

APR 25 2012  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. 83451-22



NOTE: Buyer assumes all responsibility for safety and use not in accordance with directions.

Manufactured for:  
BWA Water Additives US LLC  
1979 Lakeside Parkway, Suite 925  
Tucker, GEORGIA 30084

EPA REG. # 83451-XX  
EPA EST. # 1448-TN-01

NET WEIGHT: ## lbs (##kg)

ACCEPTED  
EPA REG. # 83451-XX  
JUL 25 2021  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. 83451-22

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



United States  
Environmental Protection  
Agency

Office of Pesticide Programs

**Antimicrobials Division (AD)**

June 28, 2012

DP BARCODE: D401439

MRID:

SUBJECT: Bellacide 301

REG. NO. OR FILE SYMBOL: 83451-EE

DOCUMENT TYPE: Product Chemistry Review

Manufacturing-use ☐ OR End-use Product ☒

INGREDIENTS (PC Codes) Tributyl tetradecyl phosphonium chloride (128824)  
(Poly[oxyethylene(dimethyliminio)ethylene(dimethyliminio)ethylene dichloride] (069183)

CAS Number: (81741-28-8), (31512-74-0)

TEST LAB: None

SUBMITTER: BWA Water Additives US LLC

GUIDELINE:

COMMODITIES: Formulation

REVIEWER: Juan F. Negrón

ORGANIZATION: AD

APPROVER: Karen P. Hicks

APPROVED DATE: 06/28/12

COMMENT: The reviewer received new updated CSF providing information in column 11 of the CSF for the diluent. The registrant did not change the date in box 21 of the CSF.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460




Office of Pesticide Programs

**Antimicrobials Division (AD)**

June 28, 2012

**MEMORANDUM**

**Subject:** Product Chemistry Review for EPA Reg # 83451-EE.  
Product name: Bellacide 301  
DP # 401439

**From:** Juan F. Negrón, Chemist   
Product Science Branch, CT Team  
Antimicrobials Division (7510P)

**Thru:** Karen P. Hicks, CT Team Leader  
Product Science Branch  
Antimicrobials Division (7510P)



**To:** Velma Noble / Drusilla Copeland  
PM Team 31  
Antimicrobials Division (7510P)

**Applicant** BWA Water Additives US LLC  
**Action Code** A540  
**Due date:** 07/30/2012

**Product Formulation from label**  
**Active Ingredient**

	% by wt.
Tributyl tetradecyl phosphonium chloride .....	5.56
Poly[oxyethylene(dimethyliminio)ethylene(dimethyliminio)ethylene dichloride] ..	3.7

## **BACKGROUND:**

In response to the Agency letter, the registrant, BWA Water Additives US LLC, has submitted an updated CSF and some of the 830 guidelines based on the deficiencies notification addressed by the Agency. The product, Bellacide 301, is a new end-use product to be used as an algaecide, bactericide, and fungicide in various industrial applications. The product is for industrial use only, using closed metered delivery systems. The product is produced by a non-integrated system. The product is under DFE pesticide pilot program in which the Agency requested to have a unique registration rather than an alternate of an existing registration. The product chemistry reviewer has received the following documents:

- A letter dated 04/12/12.
- Data matrix, dated 12/12/12.
- Draft label, pin punched on 04/26/12.
- Confidential Statement of Formula (CSF), dated 04/04/12, for the basic formulation.

## **FINDINGS:**

1. The OPPTS 830 Groups A & B product chemistry data requirements applicable to end-use products have been met.
2. The CSF, dated 04/04/12, for the basic formulation is revised.
3. The CSF and the label have the same nominal concentration for the active ingredients.
4. The registrant did not provide the information in column 11 of the CSF for the diluent.

## **CONCLUSIONS:**

The CSF, dated 04/04/12, for the basic formulation is acceptable. The OPPTS 830 Groups A & B product chemistry data requirements applicable to end-use products have been met, with the exception of OPPTS 830.6317 (Storage Stability) and OPPTS 830.6320 (Corrosion Characteristics). These studies will be available upon completion.

## **RECOMMENDATIONS:**

1. ~~The registrant must provide the information for column 11 of the CSF for the diluent. Such information can be provided later since this is a minor deficiency and should not affect the registration application.~~  
The registrant updated the CSF.

## PRODUCT CHEMISTRY REVIEW

### I. CONFIDENTIAL STATEMENT OF FORMULA

#### a. Type of formulation and source registration:

- Non-integrated formulation system [X]
- Are all TGAIs used registered? Yes [ ] No [ ]
- Integrated formulation system [ ]
- If "ME-TOO," specify EPA Reg. No. of existing product: \_\_\_\_\_

#### b. Clearance of inerts for non-food or food use:

The product is cleared for food use under 40 CFR §§180.940 and 180.950.

Yes [ ] No [x]

*Note: All inert ingredients have PC codes.*

*Note: All inert ingredients are listed on the EPA document "Inert Ingredients Permitted for Use in Nonfood Use Pesticide Products," last updated in April 2011 and available at [http://www.epa.gov/opprd001/inerts/inert\\_nonfooduse.pdf](http://www.epa.gov/opprd001/inerts/inert_nonfooduse.pdf).*

*Note: All inert ingredients are approved for non-food use. [See initialed note applied to CSF.]*

#### c. Physical state of product:

*Liquid*

#### d. The chemical IDs and analytical information (including that for the TGAIs), density, pH, and flammability are consistent with that given in 830 Series, Group B.

Yes [X] No [ ]

#### e. The NCs and CLs are acceptable.

Yes [X] No [ ]

#### f. Active ingredients

NC  
(%)

LCL  
(%)

UCL  
(%)

Tributyl tetradecyl phosphonium chloride 2.78

2.64

2.92

Poly[oxyethylene(dimethyliminio)ethylene  
(dimethyliminio)ethylene dichloride]

2.22

2.11

2.33

g. For products produced by an integrated formulation system:

- Do all impurities of toxicological significance have a UCL?  
Yes [ ]      No [ ]      Not applicable [X]
- Have all impurities of  $\geq 0.1\%$  in the product been identified?  
Yes [ ]      No [ ]      Not applicable [X]

## II PRODUCT LABEL

a. The active ingredient(s) statement (chemical IDs and NC) is consistent with the CONFIDENTIAL STATEMENT OF FORMULA.      Yes [ ]      No [X]

b. The formula contains one of the following:

- 10% or more of a petroleum distillate:      Yes [ ]      No [X]
- 1.0% or more of methyl alcohol:      Yes [ ]      No [X]
- sodium nitrite at any level:      Yes [ ]      No [X]
- a toxic List 1 inert at any level:      Yes [ ]      No [X]
- arsenic in any form:      Yes [ ]      No [X]

c. If "yes" to any of the above, does the inert ingredients statement contain a footnote indicating this?      Yes [ ]      No [ ]      Not applicable [X]

d. Appropriate warning statement(s) regarding flammability or explosive characteristics of the product are listed on the label.

Yes [ ]      No [ ]      Not applicable [X]

e. The storage and disposal instructions for the pesticide container are in compliance with PR Notice 84-1 for household use products or PR Notice 83-3 for all other uses.

Yes [X]      No [ ]

f. The product requires an expiration date at which time the NC falls below the LCL (based on the 1-year storage stability data or other information).

Yes [ ]      No [ ]

*Note: Storage stability studies are ongoing and have not been completed.*

**Table A:**  
**Product Chemistry (Series 830, Group A)**

<b>Data Requirements</b>	<b>Acceptance of Information</b>	<b>MRID No.</b>
830.1550 Product Identity <sup>1</sup>	A See CSF.	486894-05
830.1600 Description of Materials	A See CSF.	486894-05
830.1620 Production Process <sup>2</sup>	NR	
830.1650 Formulation Process <sup>3</sup>	A See CSF.	486894-05
830.1670 Formation of Impurities <sup>4</sup>	<i>[Not required for products produced by a non-integrated system.]</i>	
830.1700 Preliminary Analysis <sup>5</sup>	<i>[Not required for products produced by a non-integrated system.]</i>	
830.1750 Certified Limits <sup>6</sup>	A – Standard certified limits (or limits within the standard certified limit range) were proposed. See CSF.	486894-05
830.1800 Enforcement Analytical Method <sup>7</sup>	A	418984-02
830.1900 Submittal of Samples	<i>[Samples are to be provided on a case-by-case basis for end-use products.]</i>	

Explanation: A=acceptable; N=not acceptable (i.e., item was submitted but is not acceptable); NA=technically not applicable; NR= not required; G=data gap (i.e., item was not submitted but is required); U=requires upgrading (i.e., item is unacceptable but upgradeable); W=waived; E=EPA estimate.

<sup>1</sup>See Confidential Appendix A for additional information.

<sup>2</sup>For MP/EP products produced by an integrated formulation system.

<sup>3</sup>For products from a TGAI or MP.

<sup>4</sup>May be waived unless actual/possible impurities are of toxicological concern.

<sup>5</sup>Five batch analysis required for products produced by an integrated formulation system.

<sup>6</sup>If different from standard CLs recommended in 40 CFR 158.175, this should be discussed in Confidential Appendix A.

<sup>7</sup>Abbreviate method used as follows: gas chromatography (GC), infrared (IR), ultraviolet absorption (UV), nuclear magnetic resonance (NMR), etc.

**Table B:**  
**Physical and Chemical Characteristics (Series 830, Group B)**

Physical/Chemical Properties*	Acceptance of Data	Value or Qualitative Description	MRID No.
830.6302 Color	A	The color of the product is pale yellow at 20°C. (EPA Form 8570-36)	486894-06
830.6303 Physical State	A	The product is a transparent liquid at 20°C, based on visual inspection. (EPA Form 8570-36)	486894-06
830.6304 Odor	A	The product has a weak odor at room temperature, based on nasal assessment. (EPA Form 8570-36)	486894-06
830.6313 Stability to Normal and Elevated Temperatures, Metals, and Metal Ions	NR	<i>[Not required for end-use products.]</i>	
830.6314 Oxidation/Reduction; Chemical Incompatibility	A	The product exhibits no significant oxidation, reduction, or incompatibility, as per OPP Guidelines. (EPA Form 8570-36)  Note: The product label states: "Do not mix with other chemicals. Mix only with water."	486894-06
830.6315 Flammability/Flame Extension	A	The product does not flash below the boiling temperature, as per closed cup equilibrium method. (EPA Form 8570-36)	486894-06
830.6316 Explodability	A	The explodability of the product is predicted to be negative based on structural analysis. (EPA Form 8570-36)	486894-06
830.6317 Storage Stability	G	A storage stability study is in progress. (EPA Form 8570-36)	486894-06
830.6319 Miscibility <sup>1</sup>	NA	Not applicable. The product is not an emulsifiable liquid. (EPA Form 8570-36)	486894-06
830.6320 Corrosion Characteristics	G	A corrosion characteristics study is in progress. (EPA Form 8570-36)	486894-06
830.6321 Dielectric Breakdown Voltage	NA	Not applicable. The product is not to be used near electric equipment. (EPA Form 8570-36)	486894-06



Physical/Chemical Properties*	Acceptance of Data	Value or Qualitative Description	MRID No.
830.7000 pH <sup>2</sup>	A	The pH of the product was reported to be 5.21 at 25°C. A 1% aqueous solution of the product was tested. (EPA Form 8570-36)	486894-06
830.7050 UV/Visible Absorption	NR	<i>[Not required for end-use products.]</i>	
830.7100 Viscosity	A	The viscosity of the product was reported to be 1.52 mm <sup>2</sup> /s at 20°C (using a capillary viscometer). (EPA Form 8570-36)	486894-06
830.7200 Melting Point/Melting Range	NR	<i>[Not required for end-use products.]</i>	
830.7220 Boiling Point/Boiling Range	NR	<i>[Not required for end-use products.]</i>	
830.7300 Density/Relative Density/Bulk Density	A	The relative density of the product was reported to be 1.0 at 20°C. (EPA Form 8570-36)	486894-06
830.7370 Dissociation Constants in Water	NR	<i>[Not required for end-use products.]</i>	
830.7550/830.7560/830.7570 Partition Coefficient	NR	<i>[Not required for end-use products.]</i>	
830.7840/830.7860 Water Solubility	NR	<i>[Not required for end-use products.]</i>	
830.7950 Vapor Pressure	NR	<i>[Not required for end-use products.]</i>	

Explanation: A=acceptable; N=not acceptable (i.e., item was submitted but is not acceptable); NA=technically not applicable (i.e., not required); G=data gap (i.e., item was not submitted but is required); U=requires upgrading (i.e., item is unacceptable but upgradeable); W=waived; E=EPA estimate.

\* Provide brief description, e.g., color – yellow or property value, e.g., density 1.25 g/cc. Unless otherwise indicated, the property should be at 25°C.

<sup>1</sup>If product is an emulsifiable liquid

<sup>2</sup>If product is dispersible with water

# DATA PACKAGE BEAN SHEET

Date: 01-May-2012

Page 1 of 1

Decision #: 458598

DP #: (401439)

PRIA

Parent DP #:

Submission #: 908280

E-Sub #:

## \*\*\* Registration Information \*\*\*

Registration: **83451-EE - BELLACIDE 301**

Company: 83451 - BWA WATER ADDITIVES US LLC

Risk Manager: RM 31 - Velma Noble - (703) 308-6233 Room# PY1 S-8855

Risk Manager Reviewer: Drusilla Copeland DCOPELAN

Sent Date: \_\_\_\_\_

Calculated Due Date: 30-Jul-2012

Edited Due Date: \_\_\_\_\_

Type of Registration: Product Registration - Section 3

Action Desc: (A540) NEW PRODUCT;NON-FAST TRACK;FIFRA SEC. 2(MM) USES;

Ingredients: 128824, Tri-n-butyl tetradecyl phosphonium chloride(5.56%)

069183, Poly(oxy-1,2-ethanediyl(dimethylimino)-1,2-ethanediyl(dimethylimino)-1,2-ethanediyl dichloride)(3.7%)

## \*\*\* Data Package Information \*\*\*

Expedite: ☒ Yes ☐ No

Date Sent: 01-May-2012

Due Back: \_\_\_\_\_

DP Ingredient: 128824, Tri-n-butyl tetradecyl phosphonium chloride

069183, Poly(oxy-1,2-ethanediyl(dimethylimino)-1,2-ethanediyl(dimethylimino)-1,2-ethanediyl di

DP Title: \_\_\_\_\_

CSF Included: ☒ Yes ☐ No

Label Included: ☒ Yes ☐ No

Parent DP #: \_\_\_\_\_

### Assigned To

Date In

Date Out

Organization: AD / PSB

5/2/12

Last Possible Science Due Date: 30-Jun-2012

Team Name: CTT

5/3/12

Science Due Date: \_\_\_\_\_

Reviewer Name: Juan

5/3/12

6/28/12

Sub Data Package Due Date: \_\_\_\_\_

Contractor Name: \_\_\_\_\_

## \*\*\* Studies Sent for Review \*\*\*

No Studies

## \*\*\* Additional Data Package for this Decision \*\*\*

Can be printed on its own page

## \*\*\* Data Package Instructions \*\*\*

product Chemisty Data Package - Revised the CSF and citing two studies 418984-02 and 466486-02. Please review

5/2/12



BWA Water Additives  
1979 Lakeside Parkway  
Suite 925  
Tucker, GA 30084  
Tel 678 802 3050  
Fax 678 802 3024

April 12, 2012

RE: EPA Reg. No. 83451-EE, (Bellacide 301)  
Data Deficiency Notification  
OPP Decision Number: 458598

Ms. Noble,

This letter has been written in response to the Data Deficiency Notification (OPP Decision Number: 458598) that BWA Water Additives received regarding EPA Reg. No. 83451-EE (Bellacide 301), dated April 3, 2012.

BWA Water Additives has fulfilled all of the issues raised in the Deficiencies Notification and request that EPA review the attached revised CSF and Label for Bellacide 301 (File Symbol 83451-EE).

As all of the deficiencies have all been fulfilled including the Analytical Methodology data gap (satisfied by citing data that has been reviewed, accepted and in the Agency's files) – BWA Water Additives feels that these deficiencies did not warrant the 75 days allowed to BWA to respond and therefore, a new PRIA date of 120 days is not needed to review, so a 30 day extension be acceptable.

For additional details, please review the following noted deficiencies and the actions taken to address each deficiency.

**Deficiencies identified:**

**Product Chemistry**

Item 1: OPPTS 830.1800 (Enforcement Analytical Method). MRIDs have been provided for both Active Ingredients included in the product. Please see revised Data Matrix, dated April 12, 2012.

Item 2: OPPTS 830.1900 (Submittal of Samples) BWA must indicate the statement "Available upon request". This requirement has been satisfied in the revised Data Matrix, dated April 12, 2012.

Item 3: OPPTS 830.6317 (Storage Stability) and OPPTS 830.6320 (Physical Characteristics). The data to satisfy Storage Stability - 830.6317 are provided.

Characteristics -830.6320 are in-progress. The projected date of submission for these studies is the summer of 2012. It has been BWA's experience that these studies are typically required as part of a conditional registration and these should not hold things up at this point in the registration application process.

**Item 4: CSF revision requirements/recommendations.**

- Under Item 14a and 14b, respective certified limits of diluent had been reversed. Diluent certified upper limit now reads [REDACTED] and certified lower limit now reads [REDACTED]. Please see attached Revised CSF, dated 'April 4, 2012'.
- Under Item 2, ZIP code was amended from '6019' to read '60191'. Please see attached Revised CSF, dated 'April 4, 2012'.
- Under Item 9, 'Non-flammable' was amended to 'Non-flammable'. Please see attached Revised CSF, dated 'April 4, 2012'.

**Item 5: Labeling revision requirements/recommendations:**

- Under "Ingredients Statement" the weight percentage of Tributyl tetradecyl phosphonium chloride has been changed to '2.78%'. Please see attached proposed Labeling for Bellacide 301 (File Symbol 83451-EE).
- Under "Ingredients Statement" the weight percentage of Poly [oxyethylene(dimethyliminio)ethylene(dimethyliminio) ethylene dichloride] has been changed to '2.22%'. Please see attached proposed Labeling for Bellacide 301 (File Symbol 83451-EE).
- Under "Ingredients Statement" the weight percentage 'Inert Ingredients' has been changed to '95.00%'. Please see attached proposed Labeling for Bellacide 301 (File Symbol 83451-EE).
- A text box has been placed around the "Storage and Disposal" section. Please see attached proposed Labeling for Bellacide 301 (File Symbol 83451-EE).
- Page numbers have been added to the proposed labeling. Please see attached proposed Labeling for Bellacide 301 (File Symbol 83451-EE).

**Labeling (From the Label Review System)**

**Item 1: Restricted Use Pesticide/Child Resistant Packaging language**

- Bellacide 301 (File Symbol 83451-EE) is a diluted version of Bellacide 303 (EPA Reg. No. 83451-20). Restricted Use Pesticide language was considered during the review of Bellacide 303, but it was determined that face shields or goggles could be used to mitigate the identified hazards. Also, as the product is only used in closed systems, AD industrial hygienists and exposure experts determined that Restricted-Use classification was not necessary for Bellacide 303. Please see the Bellacide 303 (EPA Reg. No. 83451-20) stamped approved



BWA Water Additives  
1979 Lakeside Parkway  
Suite 925  
Tucker, GA 30084

Tel 678 802 3050  
Fax 678 802 3024

label dated November 10, 2010 which does NOT include RU language. It can be concluded that the diluted version of this product, Bellacide 301, would not require the Restricted-Use language either.

Item 2: Child Resistant Packaging language

- Bellacide 301 (File Symbol 83451-EE) is a diluted version of Bellacide 303 (EPA Reg. No. 83451-20). Because of its toxicity profile, Child Resistant Packaging language was triggered during the review of Bellacide 303; but because of its use profile it was determined to be exempt under 40 CFR 157.22 and 157.24. BWA understands that if Bellacide 303 or Bellacide 301 is packaged or labeled differently they may no longer be exempt. Please refer to the stamped approved label dated November 10, 2010 for Bellacide 303 (EPA Reg. No. 83451-20), which does NOT include CRP language. As mentioned above, it can be concluded that the diluted version of this product, Bellacide 301, would not require the CRP language either.

Item 3: The First-Aid statements noted are the same as those currently on the label except for the order in which they appear, the statements have been re-ordered as indicated.

Item 4: NOTE TO PHYSICIAN –this section reflects the suggested language in the Acute Toxicity review as well as that in the OPP Label Review Manual.

Thank you for your time, I look forward to hearing from you,  
Ross

Ross Beattie  
BWA Water Additives  
p) 678-802-3032  
f) 678-802-3032  
e) ross.beattie@wateradditives.com

Enclosures:

Revised Bellacide 301 CSF, dated April 4, 2012  
Revised Bellacide 301 Data Matrix, dated April 12, 2012  
Revised Bellacide 301 Labeling  
Bellacide 303 (EPA Reg. No. 83451-20) Stamped Accepted Label, dated November 10, 2011

Characteristics -830.6320 are in-progress. The projected date of submission for these studies is the summer of 2012. It has been BWA's experience that these studies are typically required as part of a conditional registration and these should not hold things up at this point in the registration application process.

**Item 4: CSF revision requirements/recommendations.**

- Under Item 14a and 14b, respective certified limits of diluent had been reversed. Diluent certified upper limit now reads [REDACTED] and certified lower limit now reads [REDACTED]. Please see attached Revised CSF, dated 'April 4, 2012'.
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- Under Item 9, 'Non-flamable' was amended to 'Non-flammable'. Please see attached Revised CSF, dated 'April 4, 2012'.

**Item 5: Labeling revision requirements/recommendations:**

- Under "Ingredients Statement" the weight percentage of Tributyl tetradecyl phosphonium chloride has been changed to '2.78%'. Please see attached proposed Labeling for Bellacide 301 (File Symbol 83451-EE).
- Under "Ingredients Statement" the weight percentage of Poly [oxyethylene(dimethyliminio)ethylene(dimethyliminio) ethylene dichloride] has been changed to '2.22%'. Please see attached proposed Labeling for Bellacide 301 (File Symbol 83451-EE).
- Under "Ingredients Statement" the weight percentage 'Inert Ingredients' has been changed to '95.00%'. Please see attached proposed Labeling for Bellacide 301 (File Symbol 83451-EE).
- A text box has been placed around the "Storage and Disposal" section. Please see attached proposed Labeling for Bellacide 301 (File Symbol 83451-EE).
- Page numbers have been added to the proposed labeling. Please see attached proposed Labeling for Bellacide 301 (File Symbol 83451-EE).

**Labeling (From the Label Review System)**

**Item 1: Restricted Use Pesticide/Child Resistant Packaging language**

- Bellacide 301 (File Symbol 83451-EE) is a diluted version of Bellacide 303 (EPA Reg. No. 83451-20). Restricted Use Pesticide language was considered during the review of Bellacide 303, but it was determined that face shields or goggles could be used to mitigate the identified hazards. Also, as the product is only used in closed systems, AD industrial hygienists and exposure experts determined that Restricted-Use classification was not necessary for Bellacide 303. Please see the Bellacide 303 (EPA Reg. No. 83451-20) stamped approved



BWA Water Additives  
1979 Lakeside Parkway  
Suite 825  
Tucker, GA 30084  
Tel 678 802 3050  
Fax 678 802 3024

April 12, 2012

RE: EPA Reg. No. 83451-EE, (Bellacide 301)  
Data Deficiency Notification  
OPP Decision Number: 458598

Ms. Noble,

This letter has been written in response to the Data Deficiency Notification (OPP Decision Number: 458598) that BWA Water Additives received regarding EPA Reg. No. 83451-EE (*Bellacide 301*), dated April 3, 2012.

BWA Water Additives has fulfilled all of the issues raised in the Deficiencies Notification and request that EPA review the attached revised CSF and Label for Bellacide 301 (File Symbol 83451-EE).

As all of the deficiencies have all been fulfilled including the Analytical Methodology data gap (satisfied by citing data that has been reviewed, accepted and in the Agency's files) – BWA Water Additives feels that these deficiencies did not warrant the 75 days allowed to BWA to respond, and therefore, a new PRIA date of 120 days is not needed to review, so a 30 day extension would be acceptable.

For additional details, please review the following noted deficiencies and the actions taken to address each deficiency.

Deficiencies identified:

**Product Chemistry**

Item 1: OPPTS 830.1800 (Enforcement Analytical Method). MRIDs have been provided for both Active Ingredients included in the product. Please see revised Data Matrix, dated April 12, 2012.

Item 2: OPPTS 830.1900 (Submittal of Samples) BWA must indicate the following statement "Available upon request". This requirement has been satisfied. Please see revised Data Matrix, dated April 12, 2012.

Item 3: OPPTS 830.6317 (Storage Stability) and OPPTS 830.6320 (Corrosion Characteristics). The data to satisfy Storage Stability - 830.6317 and Corrosive



**Bellacide 301**  
**BWA Water Additives U.S. LLC**  
**Data Matrix**  
**Page 5 of 5**

**Note 1** – Data on Bellacide 303 is being cited and requested to bridge for Acute Oral and Acute Dermal Toxicity for Bellacide 301, which is a diluted formulation of Bellacide 303. (This approach was discussed and agreed upon with OPP/AD toxicologists prior to submission, see package cover letter for details).

**Note 2** - This guideline is not applicable as described in the footnotes of CFR 158.190(a).

**Note 3** - This guideline requirement has been fulfilled by submission of EPA Forms 8570-36 and 8570-37: Self Certification for Physical/Chemical Properties (PR Notice 98-1); an MRID number has been requested for this summary and the lab report is being retained in the files of BWA Water Additives, US LLC.

**Note 4** –The data to satisfy Storage Stability - 830.6317 and Corrosive Characteristics - 830.6320 are in-progress. The projected date of submission for this study is the summer of 2012.

**Note 5** – A waiver was granted for the Subchronic Dermal Toxicity study on the technical active ingredient, TTPC. Data on the subchronic toxicity was assessed using the 90-day oral subchronic study.



**Bellacide 301**  
**BWA Water Additives U.S. LLC**  
**Data Matrix**  
**Page 5 of 5**

**Note 1** – Data on Bellacide 303 is being cited and requested to bridge for Acute Oral and Acute Dermal Toxicity for Bellacide 301, which is a diluted formulation of Bellacide 303.(This approach was discussed and agreed upon with OPP/AD toxicologists prior to submission, see package cover letter for details).

**Note 2** - This guideline is not applicable as described in the footnotes of CFR 158.190(a).

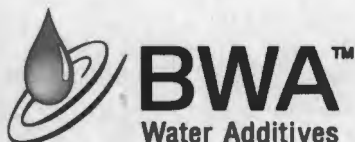
**Note 3** - This guideline requirement has been fulfilled by submission of EPA Forms 8570-36 and 8570-37: Self Certification for Physical/Chemical Properties (PR Notice 98-1); an MRID number has been requested for this summary and the lab report is being retained in the files of BWA Water Additives, US LLC.

**Note 4** –The data to satisfy Storage Stability - 830.6317 and Corrosive Characteristics - 830.6320 are in-progress. The projected date of submission for this study is the summer of 2012.

**Note 5** – A waiver was granted for the Subchronic Dermal Toxicity study on the technical active ingredient, TTPC. Data on the subchronic toxicity was assessed using the 90-day oral subchronic study.

003

11-6-21



BWA Water Additives  
1979 Lakeside Parkway  
Suite 925  
Tucker, GA 30084  
Tel 678 802 3050  
Fax 678 802 3024

April 12, 2012

Ms. Drusilla Copeland  
c/o Ms. Noble PM 37  
U.S. Environmental Protection Agency  
Document Processing Desk  
Office of Pesticide Programs (7510P)  
Room S4900, One Potomac Yard  
2777 Crystal Drive  
Arlington, VA 22202

RE: EPA Reg. No. 83451-EE, (Bellacide 301)  
Data Deficiency Notification  
OPP Decision Number: 458598

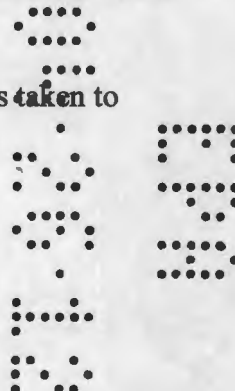
Ms. Noble,

This letter has been written in response to the Data Deficiency Notification (OPP Decision Number: 458598) that BWA Water Additives received regarding EPA Reg. No. 83451-EE (*Bellacide 301*), dated April 3, 2012.

BWA Water Additives has fulfilled all of the issues raised in the Deficiencies Notification and request that EPA review the attached revised CSF and Label for Bellacide 301 (File Symbol 83451-EE).

As all of the deficiencies have all been fulfilled including the Analytical Methodology data gap (satisfied by citing data that has been reviewed, accepted and in the Agency's files) – BWA Water Additives feels that these deficiencies did not warrant the 75 days allowed to BWA to respond, and therefore, a new PRIA date of 120 days is not needed to review, so a 90 day extension would be acceptable (new PRIA due date would be July 30, 2012).

For additional details, please review the following noted deficiencies and the actions taken to address each deficiency.



**Deficiencies identified:**

**Product Chemistry**

**Item 1:** OPPTS 830.1800 (Enforcement Analytical Method). MRIDs have been provided for both Active Ingredients included in the product. Please see revised Data Matrix, dated April 12, 2012.

**Item 2:** OPPTS 830.1900 (Submittal of Samples) BWA must indicate the following statement "Available upon request". This requirement has been satisfied. Please see revised Data Matrix, dated April 12, 2012.

**Item 3:** OPPTS 830.6317 (Storage Stability) and OPPTS 830.6320 (Corrosion Characteristics). The data to satisfy Storage Stability - 830.6317 and Corrosive Characteristics - 830.6320 are in-progress. The projected date of submission for these studies is the summer of 2012. It has been BWA's experience that these studies are typically required as part of a conditional registration and these should not hold things up at this point in the registration application process.

**Item 4:** CSF revision requirements/recommendations.

- Under Item 14a and 14b, respective certified limits of diluent had been reversed. Diluent certified upper limit now reads [REDACTED] and certified lower limit now reads [REDACTED]. Please see attached Revised CSF, dated 'April 4, 2012'.
- Under Item 2, ZIP code was amended from '6019' to read '60191'. Please see attached Revised CSF, dated 'April 4, 2012'.
- Under Item 9, 'Non-flamable' was amended to 'Non-flammable'. Please see attached Revised CSF, dated 'April 4, 2012'.

**Item 5:** Labeling revision requirements/recommendations:

- Under "Ingredients Statement" the weight percentage of Tributyl tetradecyl phosphonium chloride has been changed to '2.78%'. Please see attached proposed Labeling for Bellacide 301 (File Symbol 83451-EE).
- Under "Ingredients Statement" the weight percentage of Poly [oxyethylene(dimethyliminio)ethylene(dimethyliminio) ethylene dichloride] has been changed to '2.22%'. Please see attached proposed Labeling for Bellacide 301 (File Symbol 83451-EE).
- Under "Ingredients Statement" the weight percentage 'Inert Ingredients' has been changed to '95.00%'. Please see attached proposed Labeling for Bellacide 301 (File Symbol 83451-EE).
- A text box has been placed around the "Storage and Disposal" section. Please see attached proposed Labeling for Bellacide 301 (File Symbol 83451-EE).

- Page numbers have been added to the proposed labeling. Please see attached proposed Labeling for Bellacide 301 (File Symbol 83451-EE).

### **Labeling (From the Label Review System)**

#### **Item 1: Restricted Use Pesticide/Child Resistant Packaging language**

- Bellacide 301 (File Symbol 83451-EE) is a diluted version of Bellacide 303 (EPA Reg. No. 83451-20). Restricted Use Pesticide language was considered during the review of Bellacide 303, but it was determined that face shields or goggles could be used to mitigate the identified hazards. Also, as the product is only used in closed systems, AD industrial hygienists and exposure experts determined that Restricted-Use classification was not necessary for Bellacide 303. Please see the Bellacide 303 (EPA Reg. No. 83451-20) stamped approved label dated November 10, 2010 which does NOT include RU language. It can be concluded that the diluted version of this product, Bellacide 301, would not require the Restricted-Use language either.

#### **Item 2: Child Resistant Packaging language**

- Bellacide 301 (File Symbol 83451-EE) is a diluted version of Bellacide 303 (EPA Reg. No. 83451-20). Because of its toxicity profile, Child Resistant Packaging language was triggered during the review of Bellacide 303; but because of its use profile it was determined to be exempt under 40 CFR 157.22 and 157.24. BWA understands that if Bellacide 303 or Bellacide 301 is packaged or labeled differently they may no longer be exempt. Please refer to the stamped approved label dated November 10, 2010 for Bellacide 303 (EPA Reg. No. 83451-20), which does NOT include CRP language. As mentioned above, it can be concluded that the diluted version of this product, Bellacide 301, would not require the CRP language either.

**Item 3: The First-Aid statements noted are the same as those currently on the label except for the order in which they appear, the statements have been re-ordered as indicated.**

**Item 4: NOTE TO PHYSICIAN –this section reflects the suggested language in the Acute Toxicity review as well as that in the OPP Label Review Manual.**



**BWA™**  
Water Additives

BWA Water Additives  
1979 Lakeside Parkway  
Suite 925  
Tucker, GA 30084

Tel 678 802 3050  
Fax 678 802 3024

Thank you for your time, I look forward to hearing from you,  
Ross

Ross Beattie  
BWA Water Additives  
p) 678-802-3032  
f) 678-802-3032  
e) ross.beattie@wateradditives.com

Enclosures:

Revised Bellacide 301 CSF, dated April 4, 2012

Revised Bellacide 301 Data Matrix, dated April 12, 2012

Revised Bellacide 301 Labeling

Bellacide 303 (EPA Reg. No. 83451-20) Stamped Accepted Label, dated November 10, 2011



FW: Bellacide 301 (EPA Reg. No. 83451-EE) Data Deficiencies response  
 Ross Beattie  
 to:  
 Drusilla Copeland  
 04/12/2012 04:29 PM  
 Hide Details  
 From: Ross Beattie <ross.beattie@wateradditives.com>

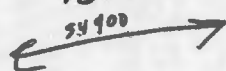
To: Drusilla Copeland/DC/USEPA/US@EPA

*sign by*

*B. Visse*

*7510P*

*54900*



*submit new data on Time Extension  
 4/23/12*

#### 6 Attachments



image003.jpg Bellacide 301 Revised Data Matrix\_April 12 2012.pdf



Bellacide 303 (83451-20) SAL\_November 10 2010.pdf 83451-EE Bellacide 301 -Revised Label April 4 2012.pdf



Bellacide 301 Revised CSF 04\_04\_12.pdf



EPA Reg No 83451-EE - Data Deficiency response letter\_April 12 2012.pdf

APR 16 2012

Sorry, the email said that it bounced back due to size limits.

I removed the pdf copies of the Tox, Product Chemistry and Data Deficiency reports that you had forwarded, they took up 5 MB of space.

Please let me know if you have any questions or concerns, and please let me know if you have received this (or the original email).

Thank you,  
 Ross

AUG 16 2012

Ross Beattie  
Product Registration  
BWA Water Additives  
p) 678-802-3032  
f) 678-802-3024

**From:** Ross Beattie  
**Sent:** Thursday, April 12, 2012 4:22 PM  
**To:** 'Drusilla Copeland'  
**Cc:** Alastair Sholl; 'Dana Lateulere'  
**Subject:** Bellacide 301 (EPA Reg. No. 83451-EE) Data Deficiencies response

RE: EPA Reg. No. 83451-EE, (Bellacide 301)  
Data Deficiency Notification  
OPP Decision Number: 458598

Ms. Noble,  
C/O Ms. Copeland,

This letter has been written in response to the Data Deficiency Notification (OPP Decision Number: 458598) that BWA Water Additives received regarding EPA Reg. No. 83451-EE (*Bellacide 301*), dated April 3, 2012.

Please note that in addition to this email and the attached documents, hardcopies of this letter and the attachments will be forwarded to you attention via FedEx courier, Tracking Number 8718 1952 1018, with an expected delivery date of Friday, April 13, 2012 (tomorrow).

BWA Water Additives has fulfilled all of the issues raised in the Deficiencies Notification and request that EPA review the attached revised CSF and Label for Bellacide 301 (File Symbol 83451-EE).

As all of the deficiencies have all been fulfilled including the Analytical Methodology data gap (satisfied by citing data that has been reviewed, accepted and in the Agency's files) – BWA Water Additives feels that these deficiencies did not warrant the 75 days allowed to BWA to respond, and therefore, a new PRIA date of 120 days is not needed to review, so a 30 day extension would be acceptable.

For additional details, please review the following noted deficiencies and the actions taken to address each deficiency.

Deficiencies identified:

**Product Chemistry**

Item 1: OPPTS 830.1800 (Enforcement Analytical Method). MRIDs have been provided for both Active Ingredients included in the product. Please see revised Data Matrix, dated April 12, 2012.

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- Under "Ingredients Statement" the weight percentage of Poly [oxyethylene(dimethyliminio) ethylene(dimethyliminio) ethylene dichloride] has been changed to '2.22%'. Please see attached proposed Labeling for Bellacide 301 (File Symbol 83451-EE).
- Under "Ingredients Statement" the weight percentage 'Inert Ingredients' has been changed to '95.00%'. Please see attached proposed Labeling for Bellacide 301 (File Symbol 83451-EE).
- A text box has been place around the "Storage and Disposal" section. Please see attached proposed Labeling for Bellacide 301 (File Symbol 83451-EE).
- Page numbers have been added to the proposed labeling. Please see attached proposed Labeling for Bellacide 301 (File Symbol 83451-EE).

#### **Labeling (From the Label Review System)**

Item 1: Restricted Use Pesticide/Child Resistant Packaging language

- Bellacide 301 (File Symbol 83451-EE) is a diluted version of Bellacide 303 (EPA Reg. No. 83451-20). Restricted Use Pesticide language was considered during the review of Bellacide 303, but it was determined that face shields or goggles could be used to mitigate the identified hazards. Also, as the product is only used in closed systems, AD industrial hygienists and exposure experts determined that Restricted-Use classification was not necessary for Bellacide 303. Please see the Bellacide 303 (EPA Reg. No. 83451-20) stamped approved label dated November 10, 2010 which does NOT include RU language. It can be concluded that the diluted version of this product, Bellacide 301, would not require the Restricted-Use language either.

Item 2: Child Resistant Packaging language

- Bellacide 301 (File Symbol 83451-EE) is a diluted version of Bellacide 303 (EPA Reg. No. 83451-20). Because of its toxicity profile, Child Resistant Packaging language was triggered during the review of Bellacide 303; but because of its use profile it was determined to be exempt under 40 CFR 157.22 and 157.24. BWA understands that if Bellacide 303 or Bellacide 301 is packaged or labeled differently they may no longer be exempt. Please refer to the stamped approved label dated November 10, 2010 for Bellacide 303 (EPA Reg. No. 83451-20), which does NOT include CRP language. As mentioned above, it can be concluded



that the diluted version of this product, Bellacide 301, would not require the CRP language either.

Item 3: The First-Aid statements noted are the same as those currently on the label except for the order in which they appear, the statements have been re-ordered as indicated.

Item 4: NOTE TO PHYSICIAN –this section reflects the suggested language in the Acute Toxicity review as well as that in the OPP Label Review Manual.

Attachments:

Revised Bellacide 301 CSF, dated April 4, 2012 – **"Bellacide 301 Revised CSF 04 04 12.pdf"**

Revised Bellacide 301 Data Matrix, dated April 12, 2012 – **"Bellacide 301 Revised Data Matrix April 12 2012.pdf"**

Revised Bellacide 301 Labeling – **"83451-EE Bellacide 301 – Revised Label April 4 2012.pdf"**

Bellacide 303 (EPA Reg. No. 83451-20) Stamped Accepted Label, dated November 10, 2010 **"Bellacide 303 (83451-20)SAL November 10 2012.pdf"**

**"Bellacide 301 Product Chemistry March 13 2012.pdf"**

**"Bellacide 301 Acute Tox Review Feb 1 2012.pdf"**

**"Bellacide 301 Data Deficiency April 3 2012"**

Thank you for your time, I look forward to hearing from you,

Ross



Ross Beattie

BWA Water Additives

p) 678-802-3032

f) 678-802-3032

e) [ross.beattie@wateradditives.com](mailto:ross.beattie@wateradditives.com)

Ross Beattie

Product Registration

BWA Water Additives

p) 678-802-3032

f) 678-802-3024

# DATA PACKAGE BEAN SHEET

Date: 11-Jan-2012

Page 1 of 2

Decision #: 458598

DP #: (397615)

PRIA

Parent DP #:

Submission #: 908280

E-Sub #:

## \*\*\* Registration Information \*\*\*

Registration: **83451-EE - BELLACIDE 301**

Company: 83451 - BWA WATER ADDITIVES US LLC

Risk Manager: RM 31 - Velma Noble - (703) 308-6233 Room# PY1 S-8855

Risk Manager Reviewer: Drusilla Copeland DCOPELAN

Sent Date: \_\_\_\_\_

Calculated Due Date: 30-Apr-2012

Edited Due Date: \_\_\_\_\_

Type of Registration: Product Registration - Section 3

Action Desc: (A540) NEW PRODUCT;NON-FAST TRACK;FIFRA SEC. 2(MM) USES;

Ingredients: 128824, Tri-n-butyl tetradecyl phosphonium chloride(5.56%)

069183, Poly(oxy-1,2-ethanediyl(dimethylimino)-1,2-ethanediyl(dimethylimino)-1,2-ethanediyl dichloride)(3.7%)

## \*\*\* Data Package Information \*\*\*

Expedite: ☐ Yes ☒ No

Date Sent: 11-Jan-2012

Due Back: \_\_\_\_\_

DP Ingredient: 128824, Tri-n-butyl tetradecyl phosphonium chloride

069183, Poly(oxy-1,2-ethanediyl(dimethylimino)-1,2-ethanediyl(dimethylimino)-1,2-ethanediyl di

DP Title: \_\_\_\_\_

CSF Included: ☒ Yes ☐ No

Label Included: ☒ Yes ☐ No

Parent DP #: \_\_\_\_\_

120  
190

### Assigned To

Date In

Date Out

Organization: AD / PSB

1/12/12

Last Possible Science Due Date: 31-Mar-2012

Team Name: CTT

1/12/12

Science Due Date: 3/28/12

Reviewer Name: Juan

2/14/12

3/14/12

Sub Data Package Due Date: 4/11/12

Contractor Name: CSC

1/12/12

## \*\*\* Studies Sent for Review \*\*\*

Printed on Page 2

## \*\*\* Additional Data Package for this Decision \*\*\*

Can be printed on its own page

## \*\*\* Data Package Instructions \*\*\*

Please review the attached documents in support of this regulation. Included is MRID's # 486894-05 and 486894-06, Data Matrix, CSF and Label.

V. Please do cart/bean (reach)

1. Juan

2. CSC

3. Wallace set date 7/1

KPH  
1/12/12

# DATA PACKAGE BEAN SHEET

Date: 11-Jan-2012

Page 1 of 2

Decision #: 458598

DP #: (397615)

PRIA

Parent DP #:

Submission #: 908280

E-Sub #:

## \*\*\* Registration Information \*\*\*

Registration: **83451-EE - BELLACIDE 301**

Company: 83451 - BWA WATER ADDITIVES US LLC

Risk Manager: RM 31 - Velma Noble - (703) 308-6233 Room# PY1 S-8855

Risk Manager Reviewer: Drusilla Copeland DCOPELAN

Sent Date: \_\_\_\_\_

Calculated Due Date: 30-Apr-2012

Edited Due Date: \_\_\_\_\_

Type of Registration: Product Registration - Section 3

Action Desc: (A540) NEW PRODUCT;NON-FAST TRACK;FIFRA SEC. 2(MM) USES;

Ingredients: 128824, Tri-n-butyl tetradecyl phosphonium chloride(5.56%)

069183, Poly(oxy-1,2-ethanediyl(dimethylimino)-1,2-ethanediyl(dimethylimino)-1,2-ethanediyl dichloride)(3.7%)

## \*\*\* Data Package Information \*\*\*

Expedite: ☐ Yes ☒ No

Date Sent: 11-Jan-2012

Due Back: \_\_\_\_\_

DP Ingredient: 128824, Tri-n-butyl tetradecyl phosphonium chloride

069183, Poly(oxy-1,2-ethanediyl(dimethylimino)-1,2-ethanediyl(dimethylimino)-1,2-ethanediyl di

DP Title: \_\_\_\_\_

CSF Included: ☒ Yes ☐ No

Label Included: ☒ Yes ☐ No

Parent DP #: \_\_\_\_\_

### Assigned To

Date In

Date Out

Organization: AD / PSB

1/12/12

Last Possible Science Due Date: 31-Mar-2012

Team Name: CTT

1/12/12

Science Due Date: 3/28/12

Reviewer Name: Juan

2/14/12

3/14/12

Sub Data Package Due Date: 4/11/12

Contractor Name: CSC

1/12/12

## \*\*\* Studies Sent for Review \*\*\*

Printed on Page 2

## \*\*\* Additional Data Package for this Decision \*\*\*

Can be printed on its own page

## \*\*\* Data Package Instructions \*\*\*

Please review the attached documents in support of this regulation. Included is MRID's # 486894-05 and 486894-06, Data Matrix, CSF and Label.

V. Please do cart/bear (reash)

1. Juan

2. CSC

3. Wallace set date TY!

KPH  
1/12/12




## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.  
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

**Paperwork Reduction Act Notice:** The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

## DATA MATRIX

Date 4/12/2012			EPA Reg No./File Symbol 83451-EE		Page 1 of 5
Applicant's/Registrant's Name & Address BWA Water Additives, US LLC, 1979 Lakeside Parkway, Suite 925, Tucker, GA 30084			Product Bellacide 301		
Ingredient tributyl tetradecyl phosphonium chloride AND poly[oxyethylene(dimethyliminio)ethylene(dimethyliminio)ethylene dichloride]					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1100	Acute Oral Toxicity	479120-01	BWA Water Additives US LLC	OWN	Note 1
870.1200	Acute Dermal Toxicity	479120-02	BWA Water Additives US LLC	OWN	Note 1
870.1300	Acute Inhalation Toxicity	486894-01	BWA Water Additives US LLC	OWN	
870.2400	Primary Eye Irritation	486894-02	BWA Water Additives US LLC	OWN	
870.2500	Primary Dermal Irritation	486894-03	BWA Water Additives US LLC	OWN	
870.2600	Dermal Sensitization	486894-04	BWA Water Additives US LLC	OWN	
830.1550	Product Identity and Composition	486894-05	BWA Water Additives US LLC	OWN	
830.1800	Description of Materials	486894-05	BWA Water Additives US LLC	OWN	
830.1620	Description of Process	n/a		-	Note 2
830.1650	Description of Formulation Process	486894-05	BWA Water Additives US LLC	OWN	
830.1670	Description of Formation of Impurities	n/a		-	Note 2
830.1700	Preliminary Analysis	n/a		-	Note 2
830.1750	Certified Limits	486894-05	BWA Water Additives US LLC	OWN	
830.1800	Enforcement Analytical Method	418984-02	Buckman Laboratories	OLD	
" "	" "	486486-02	BWA Water Additives US LLC	OWN	
Signature 			Name and Title Ross Beattie, Federal Registration Manager		Date 04/12/2012

EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

Agency Internal Use Copy



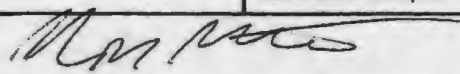
## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.  
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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## DATA MATRIX

Date 4/12/2012			EPA Reg No./File Symbol 83451-EE		Page 2 of 5
Applicant's/Registrant's Name & Address BWA Water Additives US LLC, 1979 Lakeside Parkway, Suite 925, Tucker, GA 30084			Product Bellacide 301		
Ingredient tributyl tetradecyl phosphonium chloride AND poly[oxyethylene(dimethyliminio)ethylene(dimethyliminio)ethylene dichloride]					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6302	Color	486894-06	BWA Water Additives US LLC	OWN	
830.6303	Physical State	486894-06	BWA Water Additives US LLC	OWN	
830.6304	Odor	486894-06	BWA Water Additives US LLC	OWN	
830.6314	Oxidation/Reduction: Chemical Incompatibility	486894-06	BWA Water Additives US LLC	OWN	
830.6315	Flammability	486894-06	BWA Water Additives US LLC	OWN	
830.6316	Explosibility	486894-06	BWA Water Additives US LLC	OWN	
830.6317	Storage Stability	in progress			Note 4
830.6319	Miscibility	n/a			Note 2
830.6320	Corrosion Characteristics	in progress			Note 4
830.6321	Dielectric Breakdown	n/a			
830.7000	pH	486894-06	BWA Water Additives US LLC	OWN	Note 3
830.7100	Viscosity	486894-06	BWA Water Additives US LLC	OWN	Note 3
830.7300	Density	486894-06	BWA Water Additives US LLC	OWN	Note 3
830.1900	Submittal of Samples	upon request			
Signature 			Name and Title Ross Beattie, Federal Registration Manager		Date 04/12/2012

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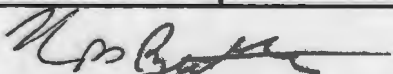


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Applicant's/Registrant's Name & Address BWA Water Additives, US LLC, 1979 Lakeside Parkway, Suite 925, Tucker, GA 30084		Product Bellacide 301			
Ingredient tributyl tetradecyl phosphonium chloride					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1100	Acute Oral Toxicity	00133040	Ciba-Geigy Corp.	OLD	
870.1200	Acute Dermal Toxicity	00133042	Ciba-Geigy Corp.	OLD	
870.1300	Acute Inhalation Toxicity	Waived			
870.2400	Primary Eye Irritation	00133044	Ciba-Geigy Corp.	OLD	
870.2500	Primary Dermal Irritation	00133046	Ciba-Geigy Corp.	OLD	Note 5
870.2600	Dermal Sensitization	46333002	Bio-Lab, Inc.	OWN	
870.3100	90 Day Feeding Toxicity Rodent	41367301	Ciba-Geigy Corp.	OLD	
870.3250	90 Day Dermal Toxicity Rodent	Waived			
84-2	Gene Mutation Battery	00133049	Ciba-Geigy Corp.	OLD	
		40680706	Ciba-Geigy Corp.	OLD	
		41185803	Ciba-Geigy Corp.	OLD	
		41555001	Ciba-Geigy Corp.	OLD	
		40680707	Ciba-Geigy Corp.	OLD	
		41185801	Ciba-Geigy Corp.	OLD	
Signature 			Name and Title Ross Beattie, Federal Registration Manager		Date 04/12/2012

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Ingredient tributyl tetradecyl phosphonium chloride					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
161-1	Hydrolysis	40680702	Ciba-Geigy Corp.	OLD	
161-2	Photodegradation in Water	40680703	Ciba-Geigy Corp.	OLD	
162-3	Anaerobic Aquatic Metabolism	00133038	Ciba-Geigy Corp.	OLD	
162-4	Aerobic Aquatic Metabolism	00133037	Ciba-Geigy Corp.	OLD	
71-2	Avian Dietary Toxicity LC50 -Bobwhite quail	00133053	Ciba-Geigy Corp.	OLD	
72-1	Freshwater Fish Acute Toxicity LC50 - Rainbow trout	00133056	Ciba-Geigy Corp.	OLD	
72-2	Freshwater Invertebrate Acute Toxicity LC50	00133057	Ciba-Geigy Corp.	OLD	
Signature <i>Ross Beattie</i>			Name and Title Ross Beattie, Federal Registration Manager		Date 04/12/2012

**Bellacide 301**  
**BWA Water Additives U.S. LLC**  
**Data Matrix**  
**Page 5 of 5**

**Note 1** – Data on Bellacide 303 is being cited and requested to bridge for Acute Oral and Acute Dermal Toxicity for Bellacide 301, which is a diluted formulation of Bellacide 303.(This approach was discussed and agreed upon with OPP/AD toxicologists prior to submission, see package cover letter for details).

**Note 2** - This guideline is not applicable as described in the footnotes of CFR 158.190(a).

**Note 3** - This guideline requirement has been fulfilled by submission of EPA Forms 8570-36 and 8570-37: Self Certification for Physical/Chemical Properties (PR Notice 98-1); an MRID number has been requested for this summary and the lab report is being retained in the files of BWA Water Additives, US LLC.

**Note 4** –The data to satisfy Storage Stability - 830.6317 and Corrosive Characteristics - 830.6320 are in-progress. The projected date of submission for this study is the summer of 2012.

**Note 5** – A waiver was granted for the Subchronic Dermal Toxicity study on the technical active ingredient, TTPC. Data on the subchronic toxicity was assessed using the 90-day oral subchronic study.






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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1100	Acute Oral Toxicity	479120-01	BWA Water Additives US LLC	OWN	Note 1
870.1200	Acute Dermal Toxicity	479120-02	BWA Water Additives US LLC	OWN	Note 1
870.1300	Acute Inhalation Toxicity	486894-01	BWA Water Additives US LLC	OWN	
870.2400	Primary Eye Irritation	486894-02	BWA Water Additives US LLC	OWN	
870.2500	Primary Dermal Irritation	486894-03	BWA Water Additives US LLC	OWN	
870.2600	Dermal Sensitization	486894-04	BWA Water Additives US LLC	OWN	
830.1550	Product Identity and Composition	486894-05	BWA Water Additives US LLC	OWN	
830.1600	Description of Materials	486894-05	BWA Water Additives US LLC	OWN	
830.1620	Description of Process	n/a		-	Note 2
830.1650	Description of Formulation Process	486894-05	BWA Water Additives US LLC	OWN	
830.1670	Description of Formation of Impurities	n/a		-	Note 2
830.1700	Preliminary Analysis	n/a		-	Note 2
830.1750	Certified Limits	486894-05	BWA Water Additives US LLC	OWN	
830.1800	Enforcement Analytical Method	418984-02	Buckman Laboratories	OLD	
" "	" "	486486-02	BWA Water Additives US LLC	OWN	
Signature 			Name and Title Ross Beattie, Federal Registration Manager		Date 04/12/2012

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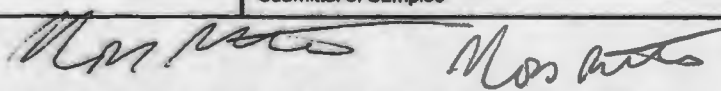


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830.6317	Storage Stability	In progress			Note 4
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830.8320	Corrosion Characteristics	In progress			Note 4
830.6321	Dielectric Breakdown	n/a			
830.7000	pH	486894-06	BWA Water Additives US LLC	OWN	Note 3
830.7100	Viscosity	486894-06	BWA Water Additives US LLC	OWN	Note 3
830.7300	Density	486894-06	BWA Water Additives US LLC	OWN	Note 3
830.1900	Submittal of Samples	upon request			
Signature 			Name and Title Ross Beattie, Federal Registration Manager		Date 04/12/2012

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870.1300	Acute Inhalation Toxicity	Waived			
870.2400	Primary Eye Irritation	00133044	Ciba-Geigy Corp.	OLD	
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870.3100	90 Day Feeding Toxicity Rodent	41367301	Ciba-Geigy Corp.	OLD	
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		41185803	Ciba-Geigy Corp.	OLD	
		41555001	Ciba-Geigy Corp.	OLD	
		40680707	Ciba-Geigy Corp.	OLD	
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Signature <i>Ross Beattie</i> <i>Ross Beattie</i>			Name and Title Ross Beattie, Federal Registration Manager		Date 04/12/2012

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Date 4/12/2012

EPA Reg No./File Symbol 83451-EE

Page 4 of 5

**Applicant's/Registrant's Name & Address**

**BWA Water Additives, US LLC, 1979 Lakeside Parkway, Suite 925, Tucker, GA 30084**

### Product

Bellacide 301

**Ingredient** tributyl tetradecyl phosphonium chloride

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
161-1	Hydrolysis	40680702	Ciba-Geigy Corp.	OLD	
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162-4	Aerobic Aquatic Metabolism	00133037	Ciba-Geigy Corp.	OLD	
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72-1	Freshwater Fish Acute Toxicity LC50 - Rainbow trout	00133056	Ciba-Geigy Corp.	OLD	
72-2	Freshwater Invertebrate Acute Toxicity LC50	00133057	Ciba-Geigy Corp.	OLD	
Signature <i>Moss Beattie</i> <i>Moss Beattie</i>			Name and Title Ross Beattie, Federal Registration Manager		Date 04/12/2012

**Bellacide 301**  
**BWA Water Additives U.S. LLC**  
**Data Matrix**  
**Page 5 of 5**

**Note 1** – Data on Bellacide 303 is being cited and requested to bridge for Acute Oral and Acute Dermal Toxicity for Bellacide 301, which is a diluted formulation of Bellacide 303. (This approach was discussed and agreed upon with OPP/AD toxicologists prior to submission, see package cover letter for details).

**Note 2** - This guideline is not applicable as described in the footnotes of CFR 158.190(a).

**Note 3** - This guideline requirement has been fulfilled by submission of EPA Forms 8570-36 and 8570-37: Self Certification for Physical/Chemical Properties (PR Notice 98-1); an MRID number has been requested for this summary and the lab report is being retained in the files of BWA Water Additives, US LLC.

**Note 4** –The data to satisfy Storage Stability - 830.6317 and Corrosive Characteristics - 830.6320 are in-progress. The projected date of submission for this study is the summer of 2012.

**Note 5** – A waiver was granted for the Subchronic Dermal Toxicity study on the technical active ingredient, TTPC. Data on the subchronic toxicity was assessed using the 90-day oral subchronic study.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APR -3 2012

OPP Decision Number: 458598

BWA Water Additives US LLC  
Product Registration Specialist  
1979 Lakeside Parkway, Suite 925  
Tucker, GA 30084

Subject: Data Deficiency  
Product Name: Bellacide 301  
EPA File Symbol: 83451-EE  
Application Date: December 6, 2011  
EPA Receipt Date: December 12, 2012

Dear Mr. Beattie:

The Agency has received and begun its in-depth review of the subject application and has determined that it is incomplete or that further information is needed. This letter is a written notification of those deficiencies and identifies your options under 40 CFR 152.105 and Section 33 of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), also known as the Pesticide Registration Improvement Renewal Act (PRIA 2). Your options under 40 CFR 152.105 and section 33 of FIFRA are addressed separately because each involves a different timeframe and set of options for responding to this letter. Please ensure that you consider each of the sections below in determining how and when you respond to this letter.

40 CFR 152.105:

Pursuant to 40 CFR 152.105, you are allowed 75 days from the date of this letter to provide a response concerning the deficiencies listed in this letter **April 16, 2012**, to provide a response concerning the deficiencies listed in this letter. Your response may include making corrections or additions to complete the application, or notifying the Agency of the date on which you expect to complete the application, or withdrawing your application. If you do not respond to this letter within 75 days or if you respond with a date on which you expect to complete the application but fail to meet that scheduled date, the Agency will treat the application as if you had withdrawn it. Withdrawal concludes the Agency's review of your application. Any subsequent submission of the same application must then be submitted as a new application with a new deadline for EPA to make a determination on your application and subject to a new registration service fee.

CONCURRENCES								
SYMBOL								
SURNAME								
DATE								



The deficiencies identified in the Agency's review at this time are:

**Product Chemistry:**

1. To satisfy OPPTS 830.1800 (Enforcement Analytical Method) requirements, a copy of an analytical method suitable for enforcement purposes must be provided for each active ingredient.
  2. To satisfy OPPTS 830.1900 Submittal of samples, you must indicate the following statement "Available upon request."
  3. To satisfy OPPTS 830.6317 (Storage Stability) and OPPTS 830.6320 (Corrosion Characteristics) requirements, results for a minimum of 1 year from a GLP-compliant storage stability and corrosion characteristics study must be provided. Testing of the product is in progress. The concentration of the active ingredients in the product must be determined at the beginning of the test period and every 3 months thereafter for a period of 1 year. Storage and disposal information on the product label must be revised if product composition (or packaging) deteriorates over time. The product should be tested in its commercial packaging.
  4. The following revisions to the CSF must be made:
    - Under Item #14a for the diluent, correct the upper certified limit from [REDACTED] to [REDACTED]. Under Item #14b for the diluent, correct the lower certified limit from [REDACTED]. These two values are "switched" on the CSF for the basic formulation.
    - Change the upper limit from [REDACTED] and the lower limit from [REDACTED] for the coupling agent.
- The following revisions to the CSF are recommended:
    - Under Item #2, revise "6019" to read "60191."
    - Under Item #9, correct the spelling from "Non-flamable" to "Non-flammable."
  - The following revisions to the product label must be made:
    - Under the "Ingredients Statement" on the product label, identify the weight percentage of Tributyl tetradecyl phosphonium chloride as "2.78%."
    - Under the "Ingredients Statement" on the product label, identify the weight percentage of Poly [oxyethylene(dimethyliminio)ethylene(dimethyliminio) ethylene dichloride] as "2.22%."
    - Under the "Ingredients Statement" on the product label, update the weight percentage of the "Inert Ingredients."

- The following revisions to the product label are recommended:
  - Place the "Storage and Disposal" section on the product label in a text box for prominence.
  - Add page numbers to each page on the product label.

## **I LABELING:**

(From the Label Review System)

**SIGNAL WORD: DANGER**

### **Hazards to Humans and Domestic Animals:**

Restricted Use Pesticide due to toxicity categories. For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification. Child Resistant Packaging Required.

Corrosive. Causes irreversible eye damage. Harmful if swallowed, inhaled or absorbed through skin. Do not get in eyes or on clothing. Avoid breathing spray mist. Wear protective eyewear (goggles, face shield, or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse. Avoid contact with skin, eyes or clothing. Wear long-sleeved shirt and long pants, socks, shoes, and gloves.

Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

### **First Aid:**

If in eyes:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- Call a poison control center or doctor for treatment advice.

If on skin:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

If inhaled:

- Move the person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.
- Call a poison control center or doctor for further treatment advice.

If swallowed:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to by a poison control center or doctor.
- Do not give anything to an unconscious person.

**NOTE TO PHYSICIAN:** Note to PM/CRM/Registrant: The proposed label should contain a Note to Physician that addresses the category I Primary Eye Irritant toxicity. The following



statements are suggested types of information that may be included, if applicable:

- technical information on symptomatology;
- use of supportive treatments to maintain life functions;
- medicine that will counteract the specific physiological effects of the pesticide;
- company telephone number to specific medical personnel who can provide specialized medical advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

#### FIFRA Section 33/PRIA:

These deficiencies must be corrected before the Agency can proceed further with this application. You are urged to contact the Agency by **April 16, 2012**, and commit to a schedule to resolve the deficiencies including your proposed re-negotiated due date for this PRIA action. Further review of your application and your response to the deficiencies may identify additional deficiencies and you will be so informed.

This application is subject to a deadline for making a determination on the application under FIFRA Section 33, Pesticide Registration Service Fees, established under PRIA. The timeframe for the Agency to make a determination on this application ends on **April 30, 2012**. Because the deadline for the agency to make a determination on this application expires before the end of the 75 days you have to respond to the deficiencies noted above, you have the following three options:

1. **Establish a new due date.** At this time you may propose a re-negotiated PRIA due date and the date you expect to submit the study and Data Matrixes to the Agency. Your re-negotiated PRIA due date must include the date that you expect to submit the fix, an additional 1-2 weeks for processing and an additional 4-months for Agency review. If you choose this option, you need to contact the Agency no later than **April 4, 2012** to discuss a time frame that allows you to address the deficiencies listed above and allows the Agency adequate time to make a regulatory decision.
2. **Withdraw the application.** Alternatively, you may notify us no later than **April 30, 2012**, that you are withdrawing your application. Withdrawal concludes the Agency's review of your application; however, you may resubmit your application after the deficiencies have been addressed. Should you choose to resubmit your application, it would be subject to a new deadline for making a determination on your application and a new registration service fee.
3. **Not respond.** If the Agency does not hear from you by **April 30, 2012**, the Agency, in meeting its obligations under section 33/PRIA may issue a determination to not grant your application. While a determination to not grant an application would allow EPA to have met its obligation under section 33 of FIFRA to issue a determination by a specified date, this determination is neither a denial of the application pursuant to section 3(c)(6) of FIFRA or a withdrawal of the application. These deficiencies must be corrected before the Agency can proceed further with this application.

Please respond to this letter by **April 16, 2012** by contacting me by telephone at (703) 308-6224 or by e-mail at [Copeland.drusilla@epa.gov](mailto:Copeland.drusilla@epa.gov) . When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,



Velma Noble  
Product Manager 31  
Regulatory Management Branch I  
Antimicrobials Division (7510P)

Enclosure: Acute Toxicity review dated 2/1/2012 and Product Chemistry review dated 3/12/2012

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



United States  
Environmental Protection  
Agency

**Office of Pesticide Programs**

**Antimicrobials Division (AD)**

March 13, 2012

DP BARCODE: D397615

MRID: 486894-00, 486894-05, & 486894-06

SUBJECT: Bellacide 301

REG. NO. OR FILE SYMBOL: 83451-EE

DOCUMENT TYPE: Product Chemistry Review

Manufacturing-use ☐ OR End-use Product ☒

INGREDIENTS (PC Codes) Tributyl tetradecyl phosphonium chloride (128824)  
(Poly[oxyethylene(dimethyliminio)ethylene(dimethyliminio)ethylene dichloride] (069183)

CAS Number: (81741-28-8), (31512-74-0)

TEST LAB: None

SUBMITTER: BWA Water Additives US LLC

GUIDELINE:

COMMODITIES: Formulation

REVIEWER: Juan F. Negrón

ORGANIZATION: AD

APPROVER: Karen P. Hicks

APPROVED DATE: 03/14/12

COMMENT:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



United States  
Environmental Protection  
Agency


Office of Pesticide Programs

**Antimicrobials Division (AD)**

March 13, 2012

**MEMORANDUM**

**Subject:** Product Chemistry Review for EPA Reg # 83451-EE.  
Product name: Bellacide 301  
DP # 397615

**From:** Juan F. Negrón, Chemist   
Product Science Branch, CT Team  
Antimicrobials Division (7510P)

**Thru:** Karen P. Hicks, CT Team Leader  
Product Science Branch  
Antimicrobials Division (7510P)



**To:** Velma Noble / Drusilla Copeland  
PM Team 31  
Antimicrobials Division (7510P)

**Applicant** BWA Water Additives US LLC  
**Action Code** A540  
**Due date:** 04/30/2012

**Product Formulation from label**  
**Active Ingredient**

**% by wt.**

Tributyl tetradecyl phosphonium chloride .....	5.56
Poly[oxyethylene(dimethyliminio)ethylene(dimethyliminio)ethylene dichloride] ..	3.7

## BACKGROUND:

The registrant, BWA Water Additives US LLC, has submitted an application for registration of a new end-use product, Bellacide 301. This product is for use as an algaecide, bactericide, and fungicide in various industrial applications. The product is for industrial use only, using closed metered delivery systems. The product is produced by a non-integrated system. The registrant submitted a Me-Too application and has indicated that the new product is identical to 34810-36 alternate CSF #3 (08/17/11) formulation. The product is under DFE pesticide pilot program in which the Agency requested to have a unique registration rather than an alternate of an existing registration. The product chemistry reviewer has received the following documents:

- A letter dated 12/06/11.
- Data matrix, dated 12/06/11.
- Draft label, pin punched on 12/09/11.
- Confidential Statement of Formula (CSF), dated 12/06/11, for the basic formulation.
- A study titled "Group A – Product Identity, Composition and Analysis" MRID 486894-05.
- A study titled "Group B – Summary of the Physical/Chemical Properties of Bellacide 301" MRID 486894-06.

## FINDINGS:

1. The OPPTS 830 Group A product chemistry data requirements applicable to end-use products have been met, with the exception of OPPTS 830.1800 (Enforcement Analytical Method) & OPPTS 830.1900 (Submittal of samples). See the "Recommendations" section of this report for deficiencies. See also Table A of this report.
2. In the study assigned MRID 486894-06, information was reported on EPA Form 8570-36 (Summary of the Physical/Chemical Properties (PR Notice 98-1)). EPA Form 8570-37 (Self-Certification Statement for the Physical/Chemical Properties (PR Notice 98-1)) was not provided.
3. The OPPTS 830 Group B product chemistry data requirements applicable to end-use products have been met, with the exception of OPPTS 830.6317 (Storage Stability) and OPPTS 830.6320 (Corrosion Characteristics). See the "Recommendations" section of this report for deficiencies. See also Table B of this report.
4. The CSF, dated 12/06/11, for the basic formulation is revised.
5. The CSF and the label do not have the same nominal concentration for the active ingredients.
6. Certain information on the CSF must be revised, as noted in the "Recommendations" section of this report.

7. Certain information on the CSF could be improved, as noted in the "Recommendations" section of this report.
8. Certain information on the product label must be revised, as noted in the "Recommendations" section of this report.
9. Certain information on the product label could be improved, as noted in the "Recommendations" section of this report.

## CONCLUSIONS:

The CSF, dated 12/06/11, for the basic formulation is not acceptable. The CSF and the label must have the same nominal concentration for the active ingredients. The OPPTS 830 Group A product chemistry data requirements applicable to end-use products have been met, with the exception of OPPTS 830.1800 (Enforcement Analytical Method) & OPPTS 830.1900 (Submittal of samples). The OPPTS 830 Group B product chemistry data requirements applicable to end-use products have been met, with the exception of OPPTS 830.6317 (Storage Stability) and OPPTS 830.6320 (Corrosion Characteristics).

## RECOMMENDATIONS:

1. To satisfy OPPTS 830.1800 (Enforcement Analytical Method) requirements, a copy of an analytical method suitable for enforcement purposes must be provided for each active ingredient.
2. To satisfy OPPTS 830.1900 Submittal of samples, the registrant must indicate the following statement "Available upon request."
3. To satisfy OPPTS 830.6317 (Storage Stability) and OPPTS 830.6320 (Corrosion Characteristics) requirements, results for a minimum of 1 year from a GLP-compliant storage stability and corrosion characteristics study must be provided. Testing of the product is in progress. The concentration of the active ingredients in the product must be determined at the beginning of the test period and every 3 months thereafter for a period of 1 year. Storage and disposal information on the product label must be revised if product composition (or packaging) deteriorates over time. The product should be tested in its commercial packaging.
4. The following revisions to the CSF must be made:
  - Under Item #14a for the diluent, correct the upper certified limit from [REDACTED] [REDACTED] Under Item #14b for the diluent, correct the lower certified limit from [REDACTED] [REDACTED] These two values are "switched" on the CSF for the basic formulation.
  - Change the upper limit from [REDACTED] and the lower limit from [REDACTED] [REDACTED] for the coupling agent.

- The following revisions to the CSF are recommended:
  - Under Item #2, revise “6019” to read “60191.”
  - Under Item #9, correct the spelling from “Non-flamable” to “Non-flammable.”
- The following revisions to the product label must be made:
  - Under the “Ingredients Statement” on the product label, identify the weight percentage of Tributyl tetradecyl phosphonium chloride as “2.78%.”
  - Under the “Ingredients Statement” on the product label, identify the weight percentage of Poly [oxyethylene(dimethyliminio)ethylene(dimethyliminio)ethylene dichloride] as “2.22%.”
  - Under the “Ingredients Statement” on the product label, update the weight percentage of the “Inert Ingredients.”
- The following revisions to the product label are recommended:
  - Place the “Storage and Disposal” section on the product label in a text box for prominence.
  - Add page numbers to each page on the product label.

## PRODUCT CHEMISTRY REVIEW

### I. CONFIDENTIAL STATEMENT OF FORMULA

#### a. Type of formulation and source registration:

- Non-integrated formulation system [X]
- Are all TGAIs used registered? Yes [ ] No [ ]
- Integrated formulation system [ ]
- If "ME-TOO," specify EPA Reg. No. of existing product: \_\_\_\_\_

#### b. Clearance of inert ingredients for non-food or food use:

The product is cleared for food use under 40 CFR §§180.940 and 180.950.  
Yes [ ] No [ ]

*Note: All inert ingredients have PC codes.*

*Note: All inert ingredients are listed on the EPA document "Inert Ingredients Permitted for Use in Nonfood Use Pesticide Products," last updated in April 2011 and available at [http://www.epa.gov/opprd001/inerts/inert\\_nonfooduse.pdf](http://www.epa.gov/opprd001/inerts/inert_nonfooduse.pdf).*

*Note: All inert ingredients are approved for non-food use. [See initialed note applied to CSF.]*

#### c. Physical state of product:

*Liquid*

#### d. The chemical IDs and analytical information (including that for the TGAIs), density, pH, and flammability are consistent with that given in 830 Series, Group B.

Yes [X] No [ ]

#### e. The NCs and CLs are acceptable.

Yes [X] No [ ]

#### f. Active ingredients

	<u>NC</u> (%)	<u>LCL</u> (%)	<u>UCL</u> (%)
Tributyl tetradecyl phosphonium chloride	2.78	2.64	2.92
Poly[oxyethylene(dimethyliminio)ethylene (dimethyliminio)ethylene dichloride]	2.22	2.11	2.33



g. For products produced by an integrated formulation system:

- Do all impurities of toxicological significance have a UCL?  
Yes [ ]      No [ ]      Not applicable [X]
- Have all impurities of  $\geq 0.1\%$  in the product been identified?  
Yes [ ]      No [ ]      Not applicable [X]

## II      PRODUCT LABEL

a. The active ingredient(s) statement (chemical IDs and NC) is consistent with the CONFIDENTIAL STATEMENT OF FORMULA.      Yes [ ]      No [X]

b. The formula contains one of the following:

- 10% or more of a petroleum distillate:      Yes [ ]      No [X]
- 1.0% or more of methyl alcohol:      Yes [ ]      No [X]
- sodium nitrite at any level:      Yes [ ]      No [X]
- a toxic List 1 inert at any level:      Yes [ ]      No [X]
- arsenic in any form:      Yes [ ]      No [X]

c. If "yes" to any of the above, does the inert ingredients statement contain a footnote indicating this?      Yes [ ]      No [ ]      Not applicable [X]

d. Appropriate warning statement(s) regarding flammability or explosive characteristics of the product are listed on the label.  
Yes [ ]      No [ ]      Not applicable [X]

e. The storage and disposal instructions for the pesticide container are in compliance with PR Notice 84-1 for household use products or PR Notice 83-3 for all other uses.  
Yes [X]      No [ ]

f. The product requires an expiration date at which time the NC falls below the LCL (based on the 1-year storage stability data or other information).  
Yes [ ]      No [ ]

*Note: Storage stability studies are ongoing and have not been completed.*

**Table A:**  
**Product Chemistry (Series 830, Group A)**

<b>Data Requirements</b>	<b>Acceptance of Information</b>	<b>MRID No.</b>
830.1550 Product Identity <sup>1</sup>	A See CSF.	486894-05
830.1600 Description of Materials	A See CSF.	486894-05
830.1620 Production Process <sup>2</sup>	NR	
830.1650 Formulation Process <sup>3</sup>	A See CSF.	486894-05
830.1670 Formation of Impurities <sup>4</sup>	<i>[Not required for products produced by a non-integrated system.]</i>	
830.1700 Preliminary Analysis <sup>5</sup>	<i>[Not required for products produced by a non-integrated system.]</i>	
830.1750 Certified Limits <sup>6</sup>	A – Standard certified limits (or limits within the standard certified limit range) were proposed. See CSF.	486894-05
830.1800 Enforcement Analytical Method <sup>7</sup>	G	
830.1900 Submittal of Samples	<i>[Samples are to be provided on a case-by-case basis for end-use products.]</i>	

Explanation: A=acceptable; N=not acceptable (i.e., item was submitted but is not acceptable); NA=technically not applicable; NR= not required; G=data gap (i.e., item was not submitted but is required); U=requires upgrading (i.e., item is unacceptable but upgradeable); W=waived; E=EPA estimate.

<sup>1</sup>See Confidential Appendix A for additional information.

<sup>2</sup>For MP/EP products produced by an integrated formulation system.

<sup>3</sup>For products from a TGAI or MP.

<sup>4</sup>May be waived unless actual/possible impurities are of toxicological concern.

<sup>5</sup>Five batch analysis required for products produced by an integrated formulation system.

<sup>6</sup>If different from standard CLs recommended in 40 CFR 158.175, this should be discussed in Confidential Appendix A.

<sup>7</sup>Abbreviate method used as follows: gas chromatography (GC), infrared (IR), ultraviolet absorption (UV), nuclear magnetic resonance (NMR), etc.

**Table B:**  
**Physical and Chemical Characteristics (Series 830, Group B)**

Physical/Chemical Properties*	Acceptance of Data	Value or Qualitative Description	MRID No.
830.6302 Color	A	The color of the product is pale yellow at 20°C. (EPA Form 8570-36)	486894-06
830.6303 Physical State	A	The product is a transparent liquid at 20°C, based on visual inspection. (EPA Form 8570-36)	486894-06
830.6304 Odor	A	The product has a weak odor at room temperature, based on nasal assessment. (EPA Form 8570-36)	486894-06
830.6313 Stability to Normal and Elevated Temperatures, Metals, and Metal Ions	NR	<i>[Not required for end-use products.]</i>	
830.6314 Oxidation/Reduction; Chemical Incompatibility	A	The product exhibits no significant oxidation, reduction, or incompatibility, as per OPP Guidelines. (EPA Form 8570-36)  Note: The product label states: "Do not mix with other chemicals. Mix only with water."	486894-06
830.6315 Flammability/Flame Extension	A	The product does not flash below the boiling temperature, as per closed cup equilibrium method. (EPA Form 8570-36)	486894-06
830.6316 Explodability	A	The explodability of the product is predicted to be negative based on structural analysis. (EPA Form 8570-36)	486894-06
830.6317 Storage Stability	G	A storage stability study is in progress. (EPA Form 8570-36)	486894-06
830.6319 Miscibility <sup>1</sup>	NA	Not applicable. The product is not an emulsifiable liquid. (EPA Form 8570-36)	486894-06
830.6320 Corrosion Characteristics	G	A corrosion characteristics study is in progress. (EPA Form 8570-36)	486894-06
830.6321 Dielectric Breakdown Voltage	NA	Not applicable. The product is not to be used near electric equipment. (EPA Form 8570-36)	486894-06

Physical/Chemical Properties*	Acceptance of Data	Value or Qualitative Description	MRID No.
830.7000 pH <sup>2</sup>	A	The pH of the product was reported to be 5.21 at 25°C. A 1% aqueous solution of the product was tested. (EPA Form 8570-36)	486894-06
830.7050 UV/Visible Absorption	NR	<i>[Not required for end-use products.]</i>	
830.7100 Viscosity	A	The viscosity of the product was reported to be 1.52 mm <sup>2</sup> /s at 20°C (using a capillary viscometer). (EPA Form 8570-36)	486894-06
830.7200 Melting Point/Melting Range	NR	<i>[Not required for end-use products.]</i>	
830.7220 Boiling Point/Boiling Range	NR	<i>[Not required for end-use products.]</i>	
830.7300 Density/Relative Density/Bulk Density	A	The relative density of the product was reported to be 1.0 at 20°C. (EPA Form 8570-36)	486894-06
830.7370 Dissociation Constants in Water	NR	<i>[Not required for end-use products.]</i>	
830.7550/830.7560/830.7570 Partition Coefficient	NR	<i>[Not required for end-use products.]</i>	
830.7840/830.7860 Water Solubility	NR	<i>[Not required for end-use products.]</i>	
830.7950 Vapor Pressure	NR	<i>[Not required for end-use products.]</i>	

Explanation: A=acceptable; N=not acceptable (i.e., item was submitted but is not acceptable); NA=technically not applicable (i.e., not required); G=data gap (i.e., item was not submitted but is required); U=requires upgrading (i.e., item is unacceptable but upgradeable); W=waived; E=EPA estimate.

\* Provide brief description, e.g., color – yellow or property value, e.g., density 1.25 g/cc. Unless otherwise indicated, the property should be at 25°C.

<sup>1</sup>If product is an emulsifiable liquid

<sup>2</sup>If product is dispersible with water

# DATA PACKAGE BEAN SHEET

Date: 08-Feb-2012

Page 1 of 2

Decision #: 458598

DP #: (397614)

PRIA

Parent DP #:

Submission #: 908280

E-Sub #:

## \*\*\* Registration Information \*\*\*

Registration: **83451-EE - BELLACIDE 301**

Company: 83451 - BWA WATER ADDITIVES US LLC

Risk Manager: RM 31 - Velma Noble - (703) 308-6233 Room# PY1 S-8855

Risk Manager Reviewer: Drusilla Copeland DCOPELAN

Sent Date: \_\_\_\_\_

Calculated Due Date: 30-Apr-2012

Edited Due Date: \_\_\_\_\_

Type of Registration: Product Registration - Section 3

Action Desc: (A540) NEW PRODUCT;NON-FAST TRACK;FIFRA SEC. 2(MM) USES;

Ingredients: 128824, Tri-n-butyl tetradecyl phosphonium chloride(5.56%)

069183, Poly(oxy-1,2-ethanediyl(dimethylimino)-1,2-ethanediyl(dimethylimino)-1,2-ethanediyl dichloride)(3.7%)

## \*\*\* Data Package Information \*\*\*

Expedite: ☐ Yes ☒ No

Date Sent: 11-Jan-2012

Due Back: \_\_\_\_\_

DP Ingredient: 128824, Tri-n-butyl tetradecyl phosphonium chloride

069183, Poly(oxy-1,2-ethanediyl(dimethylimino)-1,2-ethanediyl(dimethylimino)-1,2-ethanediyl di

DP Title: \_\_\_\_\_

CSF Included: ☒ Yes ☐ No

Label Included: ☒ Yes ☐ No

Parent DP #: \_\_\_\_\_

### Assigned To

Date In

Date Out

Organization: AD / PSB

1/12/12

2/2/12

Fast Possible Science Due Date: 31-Mar-2012

Team Name: CTT

1/12/12

2/1/12

Science Due Date: \_\_\_\_\_

Reviewer Name: *Jan*

1/12/12

2/1/12

Sub Data Package Due Date: \_\_\_\_\_

Contractor Name: \_\_\_\_\_

## \*\*\* Studies Sent for Review \*\*\*

Printed on Page 2

## \*\*\* Additional Data Package for this Decision \*\*\*

Can be printed on its own page

## \*\*\* Data Package Instructions \*\*\*

Please review the attached acute tox data in support of this registration. Included are MRID'S 486894-01 thru. 486894-04, Matrix, CSF and Label.

DP#: (397614)

\*\*\* Studies Sent for Review \*\*\*

Decision#: (458598)

MRID	MRID Status	Citation Reference	Guideline	86-5 Status
48689401		Doig, A. (2011) Bellacide 301: Acute Inhalation Toxicity Study in Rats: Final Report. Project Number: 15090/11. Unpublished study prepared by Stillmeadow, Inc. 32p.	870.1300/Acute inhalation toxicity	Pass (06-Jan-2012)
48689402		Kuhn, J. (2011) Bellacide 301: Acute Eye Irritation Study in Rabbits: Final Report. Project Number: 15533/11. Unpublished study prepared by Stillmeadow, Inc. 27p.	870.2400/Acute eye irritation	Pass (06-Jan-2012)
48689403		Kuhn, J. (2011) Bellacide 301: Primary Skin Irritation (OCSP/ OECD)/Rabbit Skin Corrosion (DOT) Study: Final Report. Project Number: 15296/11. Unpublished study prepared by Stillmeadow, Inc. 21p.	870.2500/Acute dermal irritation	Pass (06-Jan-2012)
48689404		Kuhn, J. (2011) Bellacide 301: Skin Sensitization: Local Lymph Node Assay in Mice: Final Report. Project Number: 15529/11. Unpublished study prepared by Stillmeadow, Inc. 19p.	870.2600/Skin sensitization	Pass (06-Jan-2012)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



United States  
Environmental Protection  
Agency

Office of Pesticide Programs

**Antimicrobials Division (AD)**

Wednesday, February 01, 2012

MEMORANDUM

Subject: Acute Toxicity Review for EPA Reg. No.: 83451-EE  
DP Barcode: D397614  
Product Name: Bellacide 301

From: Ian Blackwell, Biologist  
Chemistry and Toxicology Team  
Product Science Branch  
Antimicrobials Division (7510P)

IB

Through: Karen Hicks, Team Leader  
Chemistry and Toxicology Team  
Product Science Branch  
Antimicrobials Division (7510P)

KRH

To: Velma Noble, PM 31/ *Drusilla Copeland*  
Regulatory Management Branch  
Antimicrobials Division (7510P)

Applicant: BWA Water Additives US LLC

FORMULATION FROM LABEL:

<u>PC Code</u>	<u>Active Ingredient(s):</u>	<u>% by wt.</u>
128824	Tributyl Tetradecyl Phosphonium Chloride	5.56
069183	Poly[oxyethylene(dimethyliminio)ethylene (dimethyliminio) ethylene dichloride	3.70
	<u>Other Ingredient(s):</u>	<u>90.74</u>
	Total:	100.00

- I BACKGROUND: BWA Water Additives US LLC has submitted a set of four acute toxicity studies to support the acute toxicity data requirements of their pending registration, "Bellacide 301". These studies were conducted by Stillmeadow, Inc. The registrants/applicants cite acute oral and dermal toxicity data from their product, *Bellacide 303* (82451-20), to support those two data requirements.

II RECOMMENDATIONS:

1. The Chemistry and Toxicology Team (CTT) will allow the registrant to bridge acute oral and dermal toxicity data *down* from 83451-20. Both of these studies have been assigned toxicity category III. There is the possibility that, if tested, 83451-EE could be assigned toxicity category IV for acute oral and/or acute dermal toxicity. However, there are two points to note concerning the placement of toxicity category III:
  - A. Toxicity categories III and IV both carry the same Signal Word, "Caution".
  - B. The Agency allows products assigned toxicity category IV to display toxicity category III precautionary labeling if the registrants request
2. The acute inhalation toxicity study is acceptable.
3. The primary eye irritation study is acceptable. The Chemistry and Toxicology Team (CTT) notes a highly unusual finding in regards to this product, two of the dosed animals died during the eye study. This is a very serious and highly irregular finding. CTT telephoned Stillmeadow Labs. According to Janice O. Kuhn of Stillmeadow Labs (the testing facility), the two rabbits died of coccidiosis. The PM Team must consider this when addressing the labeling and Restricted Use classification of this product.
4. The primary skin irritation study is acceptable.
5. The dermal sensitization study is acceptable. The Chemistry and Toxicology Team notes that Bellacide 303, with a higher concentration of the same active ingredients, was also a dermal sensitizer. The registrants did have the option of requesting to bridge the results (positive for dermal sensitization) of the Bellacide 303 dermal sensitization study to support the dermal sensitization requirement for Bellacide 301. However, CTT has considered the *possibility* that BWA had the dermal sensitization study



conducted on Bellacide 301 in case it was not a dermal sensitizer (which turned out not to be the case).

The acute toxicity profile for File Symbol 83451-EE is currently:

Study	MRID Number	Toxicity Category	Study Status
Acute Oral Toxicity	479120-01	III	Cited
Acute Dermal Toxicity	479120-02	III	Cited
Acute Inhalation Toxicity	486894-01	III	Acceptable
Primary Eye Irritation	486894-02	I	Acceptable
Primary Skin Irritation	486894-03	IV	Acceptable
Dermal Sensitization	486894-04	Sensitizer	Acceptable

### III LABELING:

(From the Label Review System)

#### SIGNAL WORD:

**DANGER**

#### Hazards to Humans and Domestic Animals:

Restricted Use Pesticide due to toxicity categories. For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification. Child Resistant Packaging Required.

Corrosive. Causes irreversible eye damage. Harmful if swallowed, inhaled or absorbed through skin. Do not get in eyes or on clothing. Avoid breathing spray mist. Wear protective eyewear (goggles, face shield, or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse. Avoid contact with skin, eyes or clothing. Wear long-sleeved shirt and long pants, socks, shoes, and gloves.

Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

## First Aid:

### If in eyes:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- Call a poison control center or doctor for treatment advice.

### If on skin:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

### If inhaled:

- Move the person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.
- Call a poison control center or doctor for further treatment advice.

### If swallowed:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to by a poison control center or doctor.
- Do not give anything to an unconscious person.

NOTE TO PHYSICIAN: Note to PM/CRM/Registrant: The proposed label should contain a Note to Physician that addresses the category I Primary Eye Irritant toxicity. The following statements are suggested types of information that may be included, if applicable:

- technical information on symptomatology;
- use of supportive treatments to maintain life functions;
- medicine that will counteract the specific physiological effects of the pesticide;
- company telephone number to specific medical personnel who can provide specialized medical advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

# DATA REVIEW FOR ACUTE INHALATION TOXICITY (§81-3, 870.1300)

Product Manager: 31  
MRID No.: 486894-01

Reviewer: I. Blackwell  
Study Completion Date: 9/9/2011  
Lab Study No.: 15090-11

Testing Laboratory: Stillmeadow, Incorporated  
Author: Andrew Doig, M.S.

Quality Assurance (40 CFR §160.12): Included

Test Material: Bellacide 301; "pale yellow liquid"  
Concentration: 0.05, 0.51 and 2.20 mg/L

Species: Rat, Sprague-Dawley  
Weight: Males= 253-377 g Females= 181-249 g  
Age: 9-12 weeks  
Source: Texas Animal Specialties

## Summary:

1. LC<sub>50</sub> (mg/L) Males= 1.55 mg/L  
Females > 2.20 mg/L  
Combined= n/a
2. The estimated LC<sub>50</sub> is (Please refer to #1 above.)
3. MMAD: Table 2  $\mu$ m
4. Toxicity Category: III Classification: Acceptable

## Procedure (Deviation From §81-3):

- A couple of the individual gravimetric measurements were high.

## Results:

Table 1. Reported Mortality

Exposure Concentration (milligrams/liter of air)	(NUMBER DEATHS/NUMBER TESTED)		
	Males	Females	Combined
0.05 mg/L	0/5	0/5	0/10
0.51 mg/L	1/5	0/5	1/10
2.20 mg/L	3/5	0/5	3/10

Table 2.

Chamber Atmosphere			
Dose Level	MMAD	GSD	particles < 4.0 $\mu\text{m}$
0.05 mg/L	3.1 $\mu\text{m}$	5.1 $\mu\text{m}$	81.25%
0.51 mg/L	2.8 $\mu\text{m}$	5.65 $\mu\text{m}$	80.62%
2.20 mg/L	2.8 $\mu\text{m}$	5.3 $\mu\text{m}$	83.39%

Table 3.

Chamber Environment			
Test Material Concentration	0.05 mg/L	0.51 mg/L	2.20 mg/L
Chamber Volume	500 liters	500 liters	500 liters
Airflow	190 LPM	215 LPM	215 LPM
Temperature	22.4-23.2° C	23.2-23.5° C	23.2-23.5° C
Relative Humidity	56.0-65.6%	50.1-52.6%	49.2-51.4%

**Clinical Observations:** Piloerection, lack of activity, gasping, respiratory gurgles, emaciation, lack of defecation, body tremors, dark crust around eyes and/or muzzle, death.

**Gross Necropsy Findings:** Red crust around eyes and/or muzzle, lungs mottled and swollen, gas and brown liquid in stomach, gas in intestines.

## DATA REVIEW FOR PRIMARY EYE IRRITATION TESTING (§81-4, 870.2400)

<b>Product Manager:</b>	31	<b>Reviewer:</b>	I. Blackwell
<b>MRID No.:</b>	486894-02	<b>Study Completion Date:</b>	11/30/2011
		<b>Lab Study No.:</b>	15533-11

**Testing Laboratory:** Stillmeadow, Incorporated  
**Author(s):** Janice O. Kuhn, Ph.D., D.A.B.T.

**Quality Assurance (40 CFR §160.12):** Included  
**Test Material:** Bellacide 301, "pale yellow liquid"  
**Dosage:** 0.1 mL

<b>Species:</b> New Zealand White albino rabbit	<b>Sex:</b> 4 males + 1 female
<b>Weight:</b> 2.400-3.975 kg	<b>Age:</b> Approx. 20 weeks
<b>Source:</b> Myrtle's Rabbitry	

**Summary:**

1. **Toxicity Category:** I
2. **Classification:** Acceptable

**Procedure (Deviations From §81-4):**

- Two animals dosed on 9/26/2011 were found dead during the study.
- On Day 17 of the study, 3/3 animals display opacity.
- The study reported that there were no incidences of necrosis/ulceration or stippling.

**Results:**

Observations	(number "positive"/number tested)							
	Hour	Days						
	1	1	2	3	4	7	14	21
Corneal Opacity	0/3	1/3	1/3	1/3	2/3	2/3	2/3	3/3
Iritis	0/3	2/3	2/3	2/3	1/3	1/3	1/3	0/3
Conjunctivae								
Redness	1/3	3/3	3/3	3/3	3/3	3/3	2/3	0/3
Chemosis	3/3	3/3	3/3	3/3	3/3	3/3	1/3	0/3
Discharge	3/3	3/3	3/3	3/3	1/3	1/3	0/3	0/3

## DATA REVIEW FOR SKIN IRRITATION TESTING (§81-5, 870.2500)

**Product Manager:** 31  
**MRID No.:** 486894-03

**Reviewer:** I. Blackwell  
**Study Completion Date:** 9/9/2011  
**Lab Study No.:** 15296-11

**Testing Laboratory:** Stillmeadow Incorporated  
**Study Director:** Janice O. Kuhn, Ph.D.

**Quality Assurance (40 CFR §160.12):** Included

**Test Material:** Bellacide 301; "pale yellow liquid"  
**Dosage:** 0.5 mL

**Species:** New Zealand White albino rabbit  
**Weight:** 2.900 – 3.425 kg  
**Source:** Rich-Glo II, Inc.

**Age:** Approx. 18 weeks

### Summary:

1. **Toxicity Category:** IV
2. **Classification:** Acceptable

### Procedure (Deviations From §81-5):

- The relative humidity went beyond the preferred range.

**Results:** The lab observed no erythema or edema during the study. No necrosis or ulceration was observed.

**Special Comments:** No dermal irritation was observed during the study. The study was terminated after 72-hours due to a lack of irritation.

**DATA REVIEW FOR DERMAL SENSITIZATION TESTING (§81-6, 870.2600)**

**Local Lymph Node Assay**

**Product Manager:** 31

**Reviewer:** I. Blackwell

**MRID No.:** 486894-04

**Study Completion Date:** 11/30/2011

**Lab Study No.:** 15529-11

**Testing Laboratory:** Stillmeadow, Inc.

**Author:** Janice O. Kuhn, Ph.D.

**Quality Assurance (40 CFR §160.12):** Included

**Test Material:** Bellacide 301, "pale yellow liquid"

**Positive Control Material:**  $\alpha$ -hexylcinnamaldehyde in acetone:olive oil

**Species:** Mouse; CBA/J

**Weight:** 18.4-25.0 grams

**Age:** 9 weeks

**Source:** Harlan Sprague Dawley

**Method:** Local Lymph Node Assay (LLNA)

**Summary:**

1. **This Product is not a dermal sensitizer.**
2. **Classification:** Acceptable

**Procedure (Deviation From §81-6):** None

**Procedure:** Five females were assigned to each of three test groups, Groups I – III. These groups were treated with a dilution (25 or 50%) in ethanol:DI water, or undiluted test substance. Each animal received 25  $\mu$ L to the dorsum or each ear. The animals were treated once daily for three days. After a two-day rest period, all animals were injected with tritiated methyl-thymidine in the tail vein. Five hours later, the animals were sacrificed, and the draining auricular lymph nodes removed and prepared for cellular suspension and counting via scintillator. A Vehicle Control group of five females was run concurrent with the main study, these animals were treated with 80%  $\alpha$ -hexylcinnamaldehyde in acetone:olive oil.

**Results:**

Local Lymph Node Assay				
Animal Group	Test Substance Concentration	Average Count per Mouse	Number of Mice in Group	Test/ Vehicle Control Ratio
Vehicle Control	N/A	1229	5	N/A
Test Group I	25%	2671	5	2.2
Test Group II	50%	4486	5	3.7
Test Group III	100%	4494	5	3.7
Positive Control	N/A	5425	5	4.4

Bellacide 301 produced a Stimulation Index (S.I.) > 3 in two Test Groups. Therefore, Bellacide is considered a dermal sensitizer (a positive dermal response).





RE: Bellacide 301 (83451-EE)

Ross Beattie to: Jennifer Drobish

12/20/2011 11:17 AM

History:

This message has been replied to.

4 attachments



inert.status.83451.ee.docx EPA Approval of Bellacide 303 CSF Alternate Formulation II\_Mar 2 2011.pdf



Bellacide 303 CSF Alternative Formulation II - Mar 2 2011 (alt source inert, production site, AI).pdf



Template for chemical compositional data.doc

Ms. Drobish:

It is our understanding that the inert ingredient, [REDACTED] is an approved inert ingredient. Bellacide 301 (EPA Reg. No. 83451-EE) is a 5.4x dilution of Bellacide 303 (EPA Reg. No. 83451-20) and [REDACTED] is an approved source of [REDACTED] on the Bellacide 303 Alternate Formulation #2.

In Spring 2011 [REDACTED] was reviewed and approved by EPA as a source of [REDACTED], which is used as a coupling agent in Bellacide 303. Please see attached 'Bellacide 303 CSF Alternative Formulation II - Mar 2 2011.pdf' and subsequent EPA approval 'EPA Approval of Bellacide 303 CSF Alternate Formulaiton II Mar 2 2011.pdf'.

In the EPA approval document you will see that there was an issue regarding the name of a coupling agent (point 5, page 4) that required further clarification, but as you can see from the attached email "EPA Reg#83451-20 DP#388429", that was for the coupling agent called [REDACTED] [REDACTED] [REDACTED] manufacturer was contacted, the product was reviewed and approved.

Anyway, I hope that this email and support documents will allow us to include [REDACTED] as a source of coupling agent in Bellacide 301.

Thanks for your time,  
Ross

Ross Beattie  
Product Registration  
BWA Water Additives  
P: 678-802-3032  
F: 678-802-3024  
Please visit our website at [www.wateradditives.com](http://www.wateradditives.com)

-----Original Message-----

From: Jennifer Drobish [mailto:Drobish.Jennifer@epamail.epa.gov]  
Sent: Tuesday, December 20, 2011 9:03 AM  
To: Ross Beattie  
Cc: Sree Nair  
Subject: Bellacide 301 (83451-EE)

Dear Mr. Beattie,

\*Inert ingredient information may be entitled to confidential treatment\*

We have found one more deficiency regarding the Confidential Statement of Formula. Please see attached inert status form. (See attached file: inert.status.83451.ee.docx)  
Please feel free to contact me if you have any questions.

Thanks,  
Jennifer Drobish  
Macfadden Contractor  
703-305-1671

<font style="arial" size=2>This email and its attachments may be confidential and are intended solely for the use of the individual to whom it is addressed. Any views or opinions expressed are solely those of the author and do not necessarily represent those of BWA Water Additives.

If you are not the intended recipient of this email and its attachments, you must take no action based upon them, nor must you copy or show them to anyone.

Please contact the sender if you believe you have received this email in error.</font>

----- Message from "Rodriguez.Salvador@epamail.epa.gov" <Rodriguez.Salvador@epamail.epa.gov> on Fri, 22 Apr 2011 12:17:16 -0400 -----

To: Ross Beattie  
<ross.beattie@wateradditives.com>

Subject: EPA Reg # 83451-20 DP # 388429

Hello Mr. Beattie, I am in charge to do the product chemistry review for this product. I have found that the trade name [REDACTED], for one of the coupling agents, has not been clarified by the Agency. Please contact the supplier. The supplier must provide to the Agency with the full compositional chemical disclosure in (w/w)%, for this coupling agent.

(See attached file: Template for chemical compositional data.doc)

Please complete this template and send it, if you prefer, to my email as PDF file.

Thank you and enjoy your day.

Salvador M. Rodriguez  
Chemistry & Toxicology Team  
Product Science Branch  
Antimicrobial Division  
703-305-5329



**RE: Application for Registration of Bellacide 301 (83451-EE)**

Ross Beattie to: Jennifer Drobish

Cc: Sree Nair

12/15/2011 03:34 PM

2 attachments



Bellacide 301 Primary Skin Irritation (OCSPP\_OECD)\_Rabbit Skin Corrosion (DOT) Data Confidentiality Statement\_Dec 15 2011.pdf



B301 Form Exemp 8570-27 - December 15 2011.pdf

Ms. Drobish:

Thank you for taking the time to contact me on these issues.

Issue 1: "Primary Skin Irritation (OCSPP/OECD)/Rabbit Skin Corrosion (DOT)" - missing a claim of data confidentiality on page 2.

Attached as "Bellacide 301 Primary Skin Irritation (OCSPP OECD) Rabbit Skin Corrosion (DOT) Data Confidentiality Statement Dec 15 2011.pdf"

Issue 2: I was not aware that alternate sources of AI had to be included on the Formulator's Exemption Statement. Attached please find EPA Form 8570-27 that includes both sources of AI, attached as "B301 Form Exemp 8570-27 -

December 15 2011.pdf"

Please let me know if these documents will satisfy the deficiencies that you identified.

Thanks again,  
Ross

Ross Beattie  
Product Registration  
BWA Water Additives  
P: 678-802-3032  
F: 678-802-3024  
Please visit our website at [www.wateradditives.com](http://www.wateradditives.com)

-----Original Message-----

From: Drobish.Jennifer@epamail.epa.gov [mailto:Drobish.Jennifer@epamail.epa.gov]  
Sent: Thursday, December 15, 2011 9:39 AM  
To: Ross Beattie  
Cc: Nair.Sree@epamail.epa.gov  
Subject: Application for Registration of Bellacide 301 (83451-EE)

Dear Mr. Beattie,

This is Jennifer Drobish, EPA contractor. I'm writing in regards to your submission in support of the subject application. We have found the following deficiencies:

\*\*Document 3 "Primary Skin Irritation (OCSPP/OECD)/Rabbit Skin Corrosion (DOT)" - missing a claim of data confidentiality on page 2.

\*\*Formulator's Exemption Statement is missing registration [REDACTED]

\*Product ingredient source information may be entitled to confidential treatment\*

The corrections can either be faxed to me at 703-305-5060/Attn: Jennifer Drobish or emailed to me at this address. Please let me know if you have any questions.

Thank you,  
Jennifer Drobish  
Macfadden Contractor  
703-305-1671

<font style="arial" size=2>This email and its attachments may be confidential and are intended solely for the use of the individual to whom it is addressed. Any views or opinions expressed are solely those of the author and do not necessarily represent those of BWA Water Additives.

If you are not the intended recipient of this email and its attachments, you must take no action based upon them, nor must you copy or show them to anyone.

Please contact the sender if you believe you have received this email in error.</font>

Script for Rejection Phone call

**Contact Name:** Ross Beattie

**Phone #:** 678-802-3032

**Email:** Ross.beattie@wateradditives.com

**First Call/Initials:**

**Date:** 12/15/11

**Time:** 4:40 AM

**Second Call/Initials:**

**Date:**

**Time:**

**This is** Jennifer Drobish, **EPA contractor.**

**I'm calling regarding your submission in support of**

Bellacide 301 83451-EE.

**We have found the following deficiencies regarding:**

**PR Notice 86.5: Yes or No**

**Volume/Study Title:** Primary Skin Irritation (OCSP/ OECD) /  
Rabbit Skin Corrosion (DOT) Study - missing claim of  
data confidentiality

**Volume/Study Title:**

**Volume/Study Title:**

**Additional volumes continued on back of page: Yes or No**

**Application Package: Yes or No**

Missing reg # [REDACTED] on formulator's exemption  
unapproved inert

**These deficiencies have been approved by EPA.**

**The corrections can be faxed to 703-305-5060/Attn: \_\_\_\_\_.**

**Second Call/Email:**

**If we do not receive the corrections by \_\_\_\_\_, we will process your submission, accordingly. Please direct all future calls and correspondence to the appropriate EPA Risk Manager.**

# PRIA 2 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

3/23/09

21 Day Screen Start Date: 12/9/11

Experts In-Processing Signature: RM Date 12/12/11

Fee Paid: Yes     

Division management contacted on issues No      Yes      Date     

EPA Reg. Number: <u>83A51-EE</u>		EPA Receipt Date: <u>12/9/11</u>				
Items for Review				Yes	No	N/A*
1	<b>Application Form</b> (EPA Form 8570-1)(link to form) signed & complete including package type			<input checked="" type="checkbox"/>		
2	<b>Confidential Statement of Formula</b> all boxes completed, form signed, and dated (EPA Form 8570-4) (Link to form)			<input checked="" type="checkbox"/>		
	a) All inerts (link to <a href="http://www.epa.gov/opprd001/inerts/">http://www.epa.gov/opprd001/inerts/</a> ), including fragrances, approved for the proposed uses (see Footnote A)			yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	
3	<b>Certification with Respect to Citation of Data</b> (EPA Form 8570-34) (Link to form) completed and signed (N/A if 100% repack)			<input checked="" type="checkbox"/>		
	Certificate and data matrix consistent			<input checked="" type="checkbox"/>		
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)			yes <input type="checkbox"/>	no <input type="checkbox"/>	
	If applicable, is there a letter of Authorization for exclusive use only.					
4	<b>Formulator's Exemption Statement</b> (EPA Form 8570-27) (Link to form) completed and signed (N/A if source is unregistered or applicant owns the technical)			<input checked="" type="checkbox"/>		
	<b>Data Matrix</b> (EPA Form 8570-35) (Link to form) both internal and external copies (PR 98-5) (Link to PR 98-5) completed and signed (N/A if 100% repack)			<input checked="" type="checkbox"/>		
5	a) Selective Method (Fee category experts use)			yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	
	b) Cite-All (Fee category experts use)			<input type="checkbox"/>	<input type="checkbox"/>	
	c) Applicant owns all data (Fee category experts use)			<input type="checkbox"/>	<input type="checkbox"/>	
6	<b>5 Copies of Label</b> (link to <a href="http://www.epa.gov/oppfead1/labeling/lrm/">http://www.epa.gov/oppfead1/labeling/lrm/</a> ) <b>(Electronic labels on CD are encouraged and guidance is available)</b> ( link to <a href="http://www.epa.gov/pesticides/regulating/registering/submissions/index.htm#labels">http://www.epa.gov/pesticides/regulating/registering/submissions/index.htm#labels</a> )			<input checked="" type="checkbox"/>		

7	Is the data package consistent with PR Notice 86-5 (link to PRN 86-5)	X		
8	Notice of Filing (link to <a href="http://www.epa.gov/pesticides/regulating/tolerance_petitions.htm">http://www.epa.gov/pesticides/regulating/tolerance_petitions.htm</a> ) included with petitions (link to <a href="http://www.epa.gov/pesticides/regulating/tolerances.htm">http://www.epa.gov/pesticides/regulating/tolerances.htm</a> )			X
9	If applicable for conventional applications, reduced risk rationale (link to <a href="http://www.epa.gov/opprd001/workplan/reducedrisk.html">http://www.epa.gov/opprd001/workplan/reducedrisk.html</a> )			X
10	Required Data (link to <a href="http://www.epa.gov/pesticides/regulating/data_requirements.htm">http://www.epa.gov/pesticides/regulating/data_requirements.htm</a> ) and/or data waivers. See Footnote C.			
	a) List study (or studies) not included with application			

**Comments:**

- \* Passed 86.5 Review, MRID 486894. Primary Skin Irritation study was missing claim of confidentiality. Registrant provided upon request
- \* Formulator's Exemption statement was missing Reg # [REDACTED] Registrant provided a new one that included the Reg #
- \* Inerts approved for non food use - originally one inert was not approved - registrant provided composition

-JD/  
AB 12/21/11

\* N/A – Not Applicable

**Footnotes**

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses. If an unapproved inert is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses **even if a product is currently registered** by consulting the inert Web



site [link to <http://www.epa.gov/oppr001/inerts/lists.html>] and if the inert is not approved, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient**. Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at [inertsbranch@epa.gov](mailto:inertsbranch@epa.gov) and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the Chief of Microbial Pesticides Branch [Link to [http://www.epa.gov/opbbspd1/biopesticides/contacts\\_bppd.htm](http://www.epa.gov/opbbspd1/biopesticides/contacts_bppd.htm)].

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information [link to <http://www.epa.gov/oppr001/inerts/tips.pdf>] must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

### **Unapproved Inerts Identified on CSFs**

#### **All applications except conventional new products and PIPs**

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

#### Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R311, R312 or R313), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)
3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

#### PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.



**BWA™**  
Water Additives

48689400

BWA Water Additives  
1979 Lakeside Parkway  
Suite 925  
Tucker, GA 30084

Tel 678 802 3050  
Fax 678 802 3024

December 6, 2011

Via: Courier

Document Processing Desk (APPL)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency

**Room S-4900, One Potomac Yard**

**2777 South Crystal Drive**  
Arlington, VA 22202

Attn: Ms. Velma Noble  
Product Manager No. 31

Re: Bellacide 301, EPA File Symbol 83451-\*\*

Dear Ms. Noble:

BWA Water Additives, U.S., LLC (BWA) is submitting an application for registration of *Bellacide 301*, an end-use product containing the active ingredients tributyl tetradecyl phosphonate (aka TTPC, trade name Bellacide 350) and poly[oxyethylene(dimethyliminio)ethylene(dimethyliminio)ethylene dichloride] (trade name Bellacide 301).

#### Product Description

*Bellacide 301* will be used as an industrial algicide, bactericide and fungicide in industrial washers and industrial air scrubbing systems, recirculating cooling water and process water systems, non-food contact paper and paperboard process waters, enhanced oil recovery systems, storage wells and gas well drilling systems. *Bellacide 301* is proposed **only** for treatment uses and **only** with closed systems, open pouring is prohibited. *Bellacide 301* is a dilution of the recently registered product, EPA Reg. No. 83451-20, *Bellacide 301*. The two products are similar with regards to use and labeling, the percentage of active ingredient is greatly reduced in this new proposed formulation.

that the ac  
Bellacide 301  
other acute to.

Please find

- Application
  - Certificate
  - Formulation
  - Data Matrix
  - Confidentiality
  - Self Certification
  - Proposed Labeling
  - Transmittal Document
  - Final Reports (3 copies)
  - Bellacide 301- Acute
  - Bellacide 301- Acute
  - Bellacide 301- Skin Sens
  - Group A Product Identity
  - Group B - Summary of the
  - (EPA Form 8570-36). Self-C
- 48689401  
48689402  
48689403  
48689404  
48689405  
48689406



**BWA™**  
Water Additives

48689400

BWA Water Additives  
1979 Lakeside Parkway  
Suite 925  
Tucker, GA 30084

Tel 678 802 3050  
Fax 678 802 3024

December 6, 2011

Via: Courier

Document Processing Desk (APPL)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency

**Room S-4900, One Potomac Yard**

**2777 South Crystal Drive**

Arlington, VA 22202

Attn: Ms. Velma Noble  
Product Manager No. 31

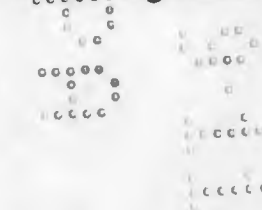
Re: Bellacide 301, EPA File Symbol 83451-\*\*

Dear Ms. Noble:

BWA Water Additives, U.S., LLC (BWA) is submitting an application for registration of *Bellacide 301*, an end-use product containing the active ingredients tributyl tetradecyl phosphonium chloride (aka TTPC, trade name Bellacide 350) and poly[oxyethylene(dimethyliminio)ethylene(dimethyliminio)ethylene dichloride] (tradename WSCP).

### Product Description

*Bellacide 301* will be used as an industrial algicide, bactericide and fungicide for use in air-washers and industrial air scrubbing systems, recirculating cooling water and process water systems, non-food contact paper and paperboard process waters, enhanced oil recovery systems, gas storage wells and gas well drilling systems. *Bellacide 301* is proposed **only** for *Industrial* water treatment uses and **only** with closed systems, open pouring is prohibited. *Bellacide 301* is a water dilution of the recently registered product, EPA Reg. No. 83451-20, *Bellacide 303*. Although the two products are similar with regards to use and labeling, the percentage of active ingredients is greatly reduced in this new proposed formulation.



## Data Citation

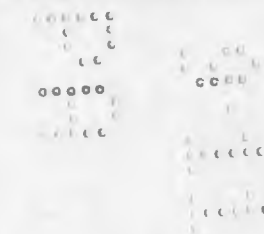
In support of this registration, BWA is using the selective method of support. A completed data matrix is enclosed, along with a certification with respect to data citation and a formulator's exemption form. Note that pages 1 and 2 of the data matrix are product specific requirements and pages 3 and 4 contain guideline requirements for the active ingredient TTPC. BWA has submitted a formulator's exemption for the technical active ingredient guideline requirements for WSCP. In support of the Group B Product chemistry requirements, BWA has submitted form EPA 8570-36, Self-Certification Summary; this document was submitted as a report and an MRID number has been requested. The original lab report is being retained in the files of BWA Water Additives, US LLC.

After consultation with AD toxicology reviewer Ian Blackwell, BWA Inc. is requesting that the acute oral and acute dermal toxicity data that was submitted and found acceptable for *Bellacide 303* be used to support *Bellacide 301*, this has been noted in the data matrix. For the other acute tox endpoints, data specific to *Bellacide 301* is being submitted with this package.

Please find the following documents enclosed:

- Application for Pesticide Registration;
- Certification with Respect to Citation of Data;
- Formulator's Exemption Form
- Data Matrix;
- Confidential Statement of Formula (two copies);
- Self Certification Statement for the Physical/Chemical Properties;
- Proposed Labeling (five copies);
- Transmittal Document; and
- Final Reports (3 copies each):

- 48689401 ○ *Bellacide 301- Acute Inhalation Toxicity Study in Rats.*
- 48689402 ○ *Bellacide 301- Acute Eye Irritation Study in Rabbits.*
- 48689403 ○ *Bellacide 301- Primary Skin Irritation – Rabbit Skin Corrosion Study.*
- 48689404 ○ *Bellacide 301- Skin Sensitization: Local Lymph Node Assay in Mice.*
- 48689405 ○ *Group A Product Identity, Composition and Analysis for Bellacide 301.*
- 48689406 ○ *Group B - Summary of the Physical/Chemical Properties of Bellacide 301 (EPA Form 8570-36). Self-Certification Summary.*





**BWA™**  
Water Additives

BWA Water Additives  
1979 Lakeside Parkway  
Suite 925  
Tucker, GA 30084

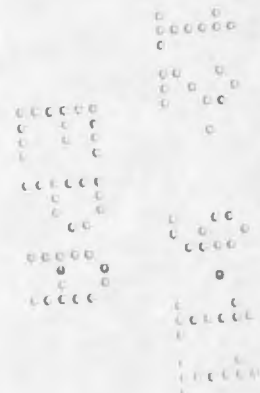
Tel 678 802 3050  
Fax 678 802 3024

If you have any questions, please phone me at 678-802-3032. I look forward to the Agency's review of this submission.

Sincerely,

Ross Beattie  
Federal Registration Manager

Enclosures







United States  
Environmental Protection Agency  
Washington, DC 20460

☒ Registration  
☐ Amendment  
☐ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number 83451-** EE	2. EPA Product Manager Velma Noble	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Bellacide 301	PM# 31	
5. Name and Address of Applicant (Include ZIP Code) BWA Water Additives US LLC 1979 Lakeside Parkway, Suite 925 Tucker, GA 30084 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: <input checked="" type="checkbox"/> EPA Reg. No. _____ Product Name _____	

## Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

PRIA Code: A540, New end-use product, FIFRA 2(mm) uses. Uses and labeling are similar to EPA Reg. No. 83451-20 but proposed product is not identical - the percent of the active ingredients is greatly reduced; four acute tox studies, one product chemistry report and self-certification product chemistry included.

## Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container Bulk containers		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Dana S. Lateulere	Title Consultant	Telephone No. (Include Area Code) 907-743-6050
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped) ..... ..... ..... .....
2. Signature 	3. Title Product Registration Specialist	
4. Typed Name Ross Beattie	5. Date December 6, 2011	





**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**1200 Pennsylvania Avenue, N.W.**  
**WASHINGTON, D.C. 20460**

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**Certification with Respect to Citation of Data**

Applicant's/Registrant's Name, Address, and Telephone Number BWA Water Additives, US LLC, 1979 Lakeside Parkway, Suite 925, Tucker GA 30084	EPA Registration Number/File Symbol 83451-**
Active Ingredient(s) and/or representative test compound(s) tributyl tetradecyl phosphonium chloride (CAS# 81741-28-8) & WSCP (CAS# 31512-74-0)	Date December 6, 2011
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Non-food aquatic	Product Name Bellacide 301

**NOTE:** If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

**SECTION I: METHOD OF DATA SUPPORT (Check one method only)**

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

**SECTION II: GENERAL OFFER TO PAY**

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☐ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

**SECTION III: CERTIFICATION**

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date Dec 6, 2011	Typed or Printed Name and Title Ross Beattie, Federal Registration Manager
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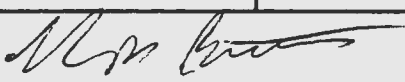


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DATA MATRIX

Date			EPA Reg No./File Symbol 83451**		Page 1 of 5
Applicant's/Registrant's Name & Address BWA Water Additives, US LLC, 1979 Lakeside Parkway, Suite 925, Tucker, GA 30084			Product Bellacide 301		
Ingredient tributyl tetradecyl phosphonium chloride AND poly[oxyethylene(dimethyliminio)ethylene(dimethyliminio)ethylene dichloride]					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1100	Acute Oral Toxicity	479120-01	BWA Water Additives US LLC	OWN	Note 1
870.1200	Acute Dermal Toxicity	479120-02	BWA Water Additives US LLC	OWN	Note 1
870.1300	Acute Inhalation Toxicity	pending	BWA Water Additives US LLC	OWN	
870.2400	Primary Eye Irritation	pending	BWA Water Additives US LLC	OWN	
870.2500	Primary Dermal Irritation	pending	BWA Water Additives US LLC	OWN	
870.2600	Dermal Sensitization	pending	BWA Water Additives US LLC	OWN	
830.1550	Product Identity and Composition	pending	BWA Water Additives US LLC	OWN	
830.1600	Description of Materials	pending	BWA Water Additives US LLC	OWN	
830.1620	Description of Process	n/a		-	Note 2
830.1650	Description of Formulation Process	pending	BWA Water Additives US LLC	OWN	
830.1670	Description of Formation of Impurities	n/a		-	Note 2
830.1700	Preliminary Analysis	n/a		-	Note 2
830.1750	Certified Limits	pending	BWA Water Additives US LLC	OWN	
830.6302	Color	pending	BWA Water Additives US LLC	OWN	Note 3
Signature 			Name and Title Ross Beattie, Federal Registration Manager		Date 12/06/2011



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Applicant's/Registrant's Name & Address BWA Water Additives US LLC, 1979 Lakeside Parkway, Suite 925, Tucker, GA 30084		Product Bellacide 301

Ingredient tributyl tetradecyl phosphonium chloride AND poly[oxyethylene(dimethyliminio)ethylene(dimethyliminio)ethylene dichloride]

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6303	Physical State	pending	BWA Water Additives US LLC	OWN	
830.6304	Odor	pending	BWA Water Additives US LLC	OWN	
830.6314	Oxidation/Reduction: Chemical Incompatibility	pending	BWA Water Additives US LLC	OWN	
830.6315	Flammability	pending	BWA Water Additives US LLC	OWN	
830.6316	Explosibility	pending	BWA Water Additives US LLC	OWN	
830.6317	Storage Stability				Note 4
830.6319	Miscibility	n/a			Note 2
830.6320	Corrosion Characteristics				Note 4
830.6321	Dielectric Breakdown	n/a			Note 2
830.7000	pH	pending	BWA Water Additives US LLC	OWN	Note 3
830.7100	Viscosity	pending	BWA Water Additives US LLC	OWN	Note 3
830.7300	Density	pending	BWA Water Additives US LLC	OWN	Note 3

Signature 	Name and Title Ross Beattie, Federal Registration Manager	Date 12/06/2011
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Ingredient tributyl tetradecyl phosphonium chloride					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1100	Acute Oral Toxicity	00133040	Ciba-Geigy Corp.	OLD	
870.1200	Acute Dermal Toxicity	00133042	Ciba-Geigy Corp.	OLD	
870.1300	Acute Inhalation Toxicity	Waived			
870.2400	Primary Eye Irritation	00133044	Ciba-Geigy Corp.	OLD	
870.2500	Primary Dermal Irritation	00133046	Ciba-Geigy Corp.	OLD	Note 5
870.2600	Dermal Sensitization	46333002	Bio-Lab, Inc.	OWN	
870.3100	90 Day Feeding Toxicity Rodent	41367301	Ciba-Geigy Corp.	OLD	
870.3250	90 Day Dermal Toxicity Rodent	Waived			
84-2	Gene Mutation Battery	00133049	Ciba-Geigy Corp.	OLD	
		40680706	Ciba-Geigy Corp.	OLD	
		41185803	Ciba-Geigy Corp.	OLD	
		41555001	Ciba-Geigy Corp.	OLD	
		40680707	Ciba-Geigy Corp.	OLD	
		41185801	Ciba-Geigy Corp.	OLD	
Signature 			Name and Title Ross Beattie, Federal Registration Manager		Date 12/06/2011



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Applicant's/Registrant's Name & Address BWA Water Additives, US LLC, 1979 Lakeside Parkway, Suite 925, Tucker, GA 30084		Product Bellacide 301

Ingredient tributyl tetradecyl phosphonium chloride

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
161-1	Hydrolysis	40680702	Ciba-Geigy Corp.	OLD	
161-2	Photodegradation in Water	40680703	Ciba-Geigy Corp.	OLD	
162-3	Anaerobic Aquatic Metabolism	00133038	Ciba-Geigy Corp.	OLD	
162-4	Aerobic Aquatic Metabolism	00133037	Ciba-Geigy Corp.	OLD	
71-2	Avian Dietary Toxicity LC50 -Bobwhite quail	00133053	Ciba-Geigy Corp.	OLD	
72-1	Freshwater Fish Acute Toxicity LC50 - Rainbow trout	00133056	Ciba-Geigy Corp.	OLD	
72-2	Freshwater Invertebrate Acute Toxicity LC50	00133057	Ciba-Geigy Corp.	OLD	

Signature 	Name and Title Ross Beattie, Federal Registration Manager	Date 12/06/2011
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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
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870.1200	Acute Dermal Toxicity	479120-02	BWA Water Additives US LLC	OWN	Note 1
870.1300	Acute Inhalation Toxicity	pending	BWA Water Additives US LLC	OWN	
870.2400	Primary Eye Irritation	pending	BWA Water Additives US LLC	OWN	
870.2500	Primary Dermal Irritation	pending	BWA Water Additives US LLC	OWN	
870.2600	Dermal Sensitization	pending	BWA Water Additives US LLC	OWN	
830.1550	Product Identity and Composition	pending	BWA Water Additives US LLC	OWN	
830.1600	Description of Materials	pending	BWA Water Additives US LLC	OWN	
830.1620	Description of Process	n/a		-	Note 2
830.1650	Description of Formulation Process	pending	BWA Water Additives US LLC	OWN	
830.1670	Description of Formation of Impurities	n/a		-	Note 2
830.1700	Preliminary Analysis	n/a		-	Note 2
830.1750	Certified Limits	pending	BWA Water Additives US LLC	OWN	
830.6302	Color	pending	BWA Water Additives US LLC	OWN	Note 3
Signature 			Name and Title Ross Beattie, Federal Registration Manager		Date 12/06/2011



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Applicant's/Registrant's Name & Address BWA Water Additives US LLC, 1979 Lakeside Parkway, Suite 925, Tucker, GA 30084	Product Bellacide 301	

Ingredient tributyl tetradecyl phosphonium chloride AND poly[oxyethylene(dimethyliminio)ethylene(dimethyliminio)ethylene dichloride]

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
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830.6314	Oxidation/Reduction: Chemical Incompatibility	pending	BWA Water Additives US LLC	OWN	
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830.6316	Explosibility	pending	BWA Water Additives US LLC	OWN	
830.6317	Storage Stability				Note 4
830.6319	Miscibility	n/a			Note 2
830.6320	Corrosion Characteristics				Note 4
830.6321	Dielectric Breakdown	n/a			Note 2
830.7000	pH	pending	BWA Water Additives US LLC	OWN	Note 3
830.7100	Viscosity	pending	BWA Water Additives US LLC	OWN	Note 3
830.7300	Density	pending	BWA Water Additives US LLC	OWN	Note 3

Signature 	Name and Title Ross Beattie, Federal Registration Manager	Date 12/06/2011
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Ingredient tributyl tetradecyl phosphonium chloride					
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870.1300	Acute Inhalation Toxicity	Waived			
870.2400	Primary Eye Irritation	00133044	Ciba-Geigy Corp.	OLD	
870.2500	Primary Dermal Irritation	00133046	Ciba-Geigy Corp.	OLD	Note 5
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870.3100	90 Day Feeding Toxicity Rodent	41367301	Ciba-Geigy Corp.	OLD	
870.3250	90 Day Dermal Toxicity Rodent	Waived			
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		41185803	Ciba-Geigy Corp.	OLD	
		41555001	Ciba-Geigy Corp.	OLD	
		40680707	Ciba-Geigy Corp.	OLD	
		41185801	Ciba-Geigy Corp.	OLD	
Signature 			Name and Title Ross Beattie, Federal Registration Manager		Date 12/06/2011





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DATA MATRIX

Date	EPA Reg No./File Symbol 83451**	Page 4 of 5
Applicant's/Registrant's Name & Address BWA Water Addtives, US LLC. 1979 Lakeside Parkway, Suite 925, Tucker, GA 30084	Product Bellacide 301	

Ingredient tributyl tetradecyl phosphonium chloride

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
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162-4	Aerobic Aquatic Metabolism	00133037	Ciba-Geigy Corp.	OLD	
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72-2	Freshwater Invertebrate Acute Toxicity LC50	00133057	Ciba-Geigy Corp.	OLD	

Signature 	Name and Title Ross Beattie, Federal Registration Manager	Date 12/06/2011
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**Bellacide 301**  
**BWA Water Additives U.S. LLC**  
**Data Matrix**  
**Page 5 of 5**

**Note 1** – Data on Bellacide 303 is being cited and requested to bridge for Acute Oral and Acute Dermal Toxicity for Bellacide 301, which is a diluted formulation of Bellacide 303.(This approach was discussed and agreed upon with OPP/AD toxicologists prior to submission, see package cover letter for details).

**Note 2** - This guideline is not applicable as described in the footnotes of CFR 158.190(a).

**Note 3** - This guideline requirement has been fulfilled by submission of EPA Forms 8570-36 and 8570-37: Self Certification for Physical/Chemical Properties (PR Notice 98-1); an MRID number has been requested for this summary and the lab report is being retained in the files of BWA Water Additives, US LLC.

**Note 4** –The data to satisfy Storage Stability - 830.6317 and Corrosive Characteristics - 830.6320 are in-progress. The projected date of submission for this study is the summer of 2012.

**Note 5** – A waiver was granted for the Subchronic Dermal Toxicity study on the technical active ingredient, TTPC. Data on the subchronic toxicity was assessed using the 90-day oral subchronic study.

843

116 21



United States  
Environmental Protection Agency  
Washington, DC 20460  
**Formulator's Exemption Statement**  
(40 CFR 152.85)

Applicant's Name and Address  <b>BWA Water Additives, US LLC</b> <b>1979 Lakeside Parkway, Suite 925</b> <b>Tucker, GA 30064</b>	EPA File Symbol/Registration Number <b>83451-**</b>
	Product Name <b>Bellacide 301</b>
	Date of Confidential Statement of Formula (EPA Form 8570-4) <b>12/06/2011</b>

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

**Tributyl tetradecyl phosphonium chloride**

and

**Poly[oxyethylene(dimethyliminio)ethylene(dimethyliminio)ethylene dichloride]**

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).

(3) Indicate by checking (A) or (B) below which paragraph applies:


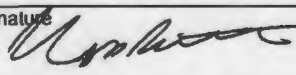
☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement.

That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source		
Active Ingredient	Product Name	Registration Number
<b>Poly[oxyethylene(dimethyliminio)ethylene(dimethyliminio)ethylene dichloride]</b>		
Signature 	Name and Title <b>Ross Beattie, Reg. Specialist</b>	Date <b>12/06/2011</b>



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**1200 Pennsylvania Avenue, N.W.**  
**WASHINGTON, D.C. 20460**

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**SELF-CERTIFICATION STATEMENT FOR THE  
 PHYSICAL/CHEMICAL PROPERTIES (PR NOTICE 98-1)**

Product Name: **Bellacide 301**

Reg. No./File Symbol No.  
 (if known) or Company No. **83451-\*\***

**SELF-CERTIFICATION STATEMENT:**

I certify that the reported information on the "Summary Form" represents a true and accurate record of the test results of studies generated or owned by (Company Name): **BWA Water Additives US LLC** and that the values of the properties reported are reliable.

I further certify that such data were generated in substantial conformity with OPPTS Test Guideline Series 830 Product Properties, applicable to my product, and in effect at the time of submission.

As a condition of registration, EPA may, by order, (1) withdraw a pending registration, (2) suspend the registration of this product without opportunity for hearing, or (3) assess civil penalties provided for in section 14 of FIFRA for violations of section 12(a)(2)(N) of FIFRA without opportunity for hearing, if I have not submitted to EPA within thirty (30) days of receipt of a request by the Agency, or within a specified time agreed to by the Agency, test results of studies summarized in the "Summary Form."

As a condition of registration, EPA may, by order, (1) withdraw a pending registration, (2) suspend the registration of this product without opportunity for hearing, or (3) assess civil penalties provided for in section 14 of FIFRA for violations of sections 12(a)(2)(N), 12(a)(2)(Q), or 12(a)(2)(R) of FIFRA without opportunity for hearing, if I fail to provide to EPA within thirty (30) days of receipt of a notification of error, or within a specified time agreed to by the Agency, information that EPA determines is required to correct the error.

Type Applicant's Name: **Ross Beattie**

Title: **Federal Registration Manager**

Telephone No. **678-802-3032**

Applicant's Signature: *Ross Beattie*

Date: **December 6, 2011**

## Ross Beattie

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**From:** paygovadmin@mail.doc.twai.gov  
**Sent:** Wednesday, December 07, 2011 9:53 AM  
**To:** Ross Beattie  
**Subject:** Pay.Gov Payment Confirmation

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** Red Category

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.

### Transaction Summary

Application Name: PRIA Service Fees  
Pay.gov Tracking ID: 25556GCN  
Agency Tracking ID: 74261414296  
Transaction Type: Sale  
Transaction Date: Dec 7, 2011 9:52:39 AM

Account Holder Name: Kathryn D Modolo  
Transaction Amount: \$4,631.00  
Billing Address: [REDACTED]  
City: [REDACTED]  
State/Province: [REDACTED]  
Zip/Postal Code: [REDACTED]  
Country: USA  
Card Type: Visa  
Card Number: \*\*\*\*\*4060

Decision Number:  
Registration Number:  
Company Name: BWA Water Additives US LL  
Company Number: 83451  
Action Code: A540

\*Personal privacy information\*





## A540 - New end use product.

- Must submit or reference Group A and B product chemistry, toxicity, and/or efficacy data for each proposed product.
- Data waivers may be requested. Chemistry data on the TGAI in addition to the EP is required if an unregistered source is used.

End Use (EP) or Manufacturing Use (MP) product or Technical Grade of the Active Ingredient (TGAI)

Guideline No.	Group A: Product Chemistry Data Study Title	EP Data Submitted	MP Data Submitted	TGAI Data Submitted
830.1550	Product Identity & Composition	X		
830.1600	Description of materials used to produce the product	X		
830.1650	Description of formulation process	X		
830.1670	Discussion on the formation of impurities	X		
830.1700	Preliminary analysis	X		
830.1750	Certified limits (158.345)	X		
830.1800	Enforcement analytical method			

Guideline No.	Group B: Product Chemistry Data Study Title	EP Data Submitted	MP Data Submitted	TGAI Data Submitted
830.6302	Color	X		
830.6303	Physical State	X		
830.6304	Odor	X		
830.6313	Stability to normal and elevated temperatures metal and metal ions			
830.6314	Oxidation/Reduction (Chemical incompatibility)	X		
830.6315	Flammability	X		
830.6316	Explosibility	X		
830.6317	Storage stability*	X		
830.6319	Miscibility	X		
830.6320	Corrosion Characteristics*	X		
830.6321	Dielectric Breakdown Voltage	X		
830.7000	pH	X		
830.7050	UV/ Visible Absorption			
830.7100	Viscosity	X		
830.7200	Melting Point			
830.7220	Boiling Point			
830.7300	Density	X		
830.7370	Dissociation Constant			
830.7550	Partition Coefficient			
830.7840	Water Solubility			
830.7950	Vapor Pressure			

Grayed out = data not required

\*May not be included with initial application

## A540 – Acute Toxicity Requirements

New products must either:

- 1) supply the product specific acute toxicity 6 pack data (listed below),
- 2) provide a bridging rationale document or waiver request or,
- 3) use the cite all method of data compensation, if applicable. The bridging document directs OPP to use a currently registered set of 6 acute toxicity data and label; instead of submitting product specific data.

Guideline No.	Acute toxicity (6 pack) Study Title	Cite All	Selective	Waiver Request	Bridging Rational
830.1100	Acute Oral (LD50)		X		
830.1200	Acute Dermal (LD50)		X		
830.1300	Acute Inhalation (LC50)		X		
830.2400	Acute Eye Irritation		X		
830.2500	Acute Dermal Irritation		X		
830.2600	Dermal Sensitization		X		



## A540 - New end use product.

- Must submit or reference Group A and B product chemistry, toxicity, and/or efficacy data for each proposed product.
- Data waivers may be requested. Chemistry data on the TGA1 in addition to the EP is required if an unregistered source is used.

End Use (EP) or Manufacturing Use (MP) product or Technical Grade of the Active Ingredient (TGA1)

Guideline No.	Group A: Product Chemistry Data Study Title	EP Data Submitted	MP Data Submitted	TGA1 Data Submitted
830.1550	Product Identity & Composition	X		
830.1600	Description of materials used to produce the product	X		
830.1650	Description of formulation process	X		
830.1670	Discussion on the formation of impurities	X		
830.1700	Preliminary analysis	X		
830.1750	Certified limits (158.345)	X		
830.1800	Enforcement analytical method			

Guideline No.	Group B: Product Chemistry Data Study Title	EP Data Submitted	MP Data Submitted	TGA1 Data Submitted
830.6302	Color	X		
830.6303	Physical State	X		
830.6304	Odor	X		
830.6313	Stability to normal and elevated temperatures metal and metal ions			
830.6314	Oxidation/Reduction (Chemical incompatibility)	X		
830.6315	Flammability	X		
830.6316	Explosibility	X		
830.6317	Storage stability*	X		
830.6319	Miscibility	X		
830.6320	Corrosion Characteristics*	X		
830.6321	Dielectric Breakdown Voltage	X		
830.7000	pH	X		
830.7050	UV/ Visible Absorption			
830.7100	Viscosity	X		
830.7200	Melting Point			
830.7220	Boiling Point			
830.7300	Density	X		
830.7370	Dissociation Constant			
830.7550	Partition Coefficient			
830.7840	Water Solubility			
830.7950	Vapor Pressure			

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- 2) provide a bridging rationale document or waiver request or,
- 3) use the cite all method of data compensation, if applicable. The bridging document directs OPP to use a currently registered set of 6 acute toxicity data and label; instead of submitting product specific data.

Guideline No.	Acute toxicity (6 pack) Study Title	Cite All	Selective	Waiver Request	Bridging Rational
830.1100	Acute Oral (LD50)		X		
830.1200	Acute Dermal (LD50)		X		
830.1300	Acute Inhalation (LC50)		X		
830.2400	Acute Eye Irritation		X		
830.2500	Acute Dermal Irritation		X		
830.2600	Dermal Sensitization		X		

## A540 - New end use product.

- Must submit or reference Group A and B product chemistry, toxicity, and/or efficacy data for each proposed product.
- Data waivers may be requested. Chemistry data on the TGAI in addition to the EP is required if an unregistered source is used.

End Use (EP) or Manufacturing Use (MP) product or Technical Grade of the Active Ingredient (TGAI)

Guideline No.	Group A: Product Chemistry Data Study Title	EP Data Submitted	MP Data Submitted	TGAI Data Submitted
830.1550	Product Identity & Composition	X		
830.1600	Description of materials used to produce the product	X		
830.1650	Description of formulation process	X		
830.1670	Discussion on the formation of impurities	X		
830.1700	Preliminary analysis	X		
830.1750	Certified limits (158.345)	X		
830.1800	Enforcement analytical method			

Guideline No.	Group B: Product Chemistry Data Study Title	EP Data Submitted	MP Data Submitted	TGAI Data Submitted
830.6302	Color	X		
830.6303	Physical State	X		
830.6304	Odor	X		
830.6313	Stability to normal and elevated temperatures metal and metal ions			
830.6314	Oxidation/Reduction (Chemical incompatibility)	X		
830.6315	Flammability	X		
830.6316	Explosibility	X		
830.6317	Storage stability*	X		
830.6319	Miscibility	X		
830.6320	Corrosion Characteristics*	X		
830.6321	Dielectric Breakdown Voltage	X		
830.7000	pH	X		
830.7050	UV/ Visible Absorption			
830.7100	Viscosity	X		
830.7200	Melting Point			
830.7220	Boiling Point			
830.7300	Density	X		
830.7370	Dissociation Constant			
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## A540 – Acute Toxicity Requirements

New products must either:

- 1) supply the product specific acute toxicity 6 pack data (listed below),
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- 3) use the cite all method of data compensation, if applicable. The bridging document directs OPP to use a currently registered set of 6 acute toxicity data and label; instead of submitting product specific data.

<b>Guideline No.</b>	<b>Acute toxicity (6 pack) Study Title</b>	<b>Cite All</b>	<b>Selective</b>	<b>Waiver Request</b>	<b>Bridging Rational</b>
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830.2400	Acute Eye Irritation		X		
830.2500	Acute Dermal Irritation		X		
830.2600	Dermal Sensitization		X		